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## Abstract

This paper describes money laundering techniques used by different criminal organizations operating in the U.S. sex market. Prior to this study, scholars have not investigated money laundering techniques used in the U.S. sex market in a comprehensive manner. This paper describes and categorizes methods used for money laundering. It discusses the similarities and differences in money laundering techniques in the U.S. sex markets. Current challenges to combating money laundering are reviewed and recommendations are made to strengthen the ongoing fight against money laundering in the U.S. sex markets.

## Keywords

United States, commercial sexual exploitation, prostitution, sex trafficking, child sex pornography, child trafficking, money laundering, financial crimes, sex market

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## MONEY LAUNDERING IN THE COMMERCIAL SEX MARKET IN THE UNITED STATES

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### ABSTRACT

This paper describes money laundering techniques used by different criminal organizations operating in the U.S. sex market. Prior to this study, scholars have not investigated money laundering techniques used in the U.S. sex market in a comprehensive manner. This paper describes and categorizes methods used for money laundering. It discusses the similarities and differences in money laundering techniques in the U.S. sex markets. Current challenges to combating money laundering are reviewed and recommendations are made to strengthen the ongoing fight against money laundering in the U.S. sex markets.

### KEYWORDS

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PROSTITUTION IS A LUCRATIVE CRIMINAL MARKET in the United States. The size of the illicit massage industry alone is estimated at 2.5 billion dollars a year (Polaris, 2018, p. 3). However, little is known about how criminals process, transfer, or conceal their illicit proceeds in the sex market, which makes it difficult for law enforcement to uncover the illegal funds (Raphael & Meyers-Powell, 2010, p. 4; Petrunov, 2011, p. 1). This study aims to provide an overview of the various money laundering schemes used by criminals operating in U.S. sex markets by analyzing U.S. federal and state court cases, press releases, and news articles on money laundering. Current efforts used by U.S. authorities to combat financial crimes are examined, as well as recommendations to strengthen law enforcement's ongoing efforts and policy mechanisms in the fight against the commercial sex market.

Money laundering is the process by which criminals conceal the source of their illicit income, making it appear legitimate (Driggers, 2011, p. 929). In the past, the primary goal behind the U.S. anti-money laundering law was to combat narcotics trafficking (Stessens, 2000). Recently, U.S. authorities began expanding anti-money laundering efforts to fight other crimes, including commercial sexual exploitation (U.S. Immigration & Customs Enforcement, 2018; *U.S. v. Orlando, et al.*, 2002; Project STAMP, 2018).

In the past, some scholars explored financial crimes in human trafficking markets outside the U.S. In 2008, Leman and Janssens analyzed criminals' financial

modus operandi including the cost of recruitment, the purchasing and sale of victims, and investment tactics used to expand human trafficking networks (Leman & Janssens, 2008). Leman and Janssens studied 62 cases of Eastern European sex trafficking networks prosecuted in Belgium. The criminal networks included Russian, Romanian, Bulgarian and other ethnic groups (Leman & Janssens, 2008, p. 436). Their study found that traffickers' financial and criminal networks evolved to expand their sex trafficking businesses (Leman & Janssens, 2008).

In 2015, another study explored financial crimes in the sex trafficking market between the UK and India. The study used multistage stratified sampling to analyze survey responses of 124 individuals and identified the investment techniques and money laundering schemes used by the trafficking network between the UK and India (Sarkar, 2015). In 2012, Griffin and Wilson showed several money laundering schemes that can be used by sex traffickers in the U.S. (Griffin & Wilson, 2012, p. 138).

Money laundering is a three-stage process. The first stage, placement, is a physical deposit of illicit funds into a financial institution (Alford, 1994, p. 439). One example of the placement stage is structuring, which is a process of depositing less than \$10,000 into a financial institution to avoid law enforcement detection (Lan, 2004, p. 68). The second stage of money laundering is layering, which refers to the process of transferring funds to disguise their illegal source (FATF, n.d.). Examples of layering include transfer of money to different countries or multiple investments in order to hide the illicit funds from their source (Stages of Money Laundering, n.d.). The third stage is integration, which is the process of reintegrating illicit profit into a legitimate economy (ICAS Practice Support, 2019). Examples of integration include fake employees, loans, or dividends paid to the shareholders of a company controlled by criminals (ICAS Practice Support, 2019).

These studies revealed the importance of investigating financial crimes in the sex market. However, they are insufficient to provide a wholistic solution to the problem in the U.S. Therefore, further investigation is necessary to develop an appropriate response.

## METHODS

Criminals use various business tactics to prostitute women and children in the U.S. (Echols, 2016; Polaris, n.d.). Evidence suggests that criminals from different ethnic backgrounds use various business models to operate in the U.S. sex market. (*U. S. v. Kim et al.*, 2016; *U. S. v. Costanzo*, 2011; *U. S. v. Blair*, 2000; *Cikraji v. Vickers*, 2010). Therefore, this study analyzed their money laundering techniques depending on their ethnic backgrounds.

Past studies have shown that prostitution and sex trafficking often intersect with one another (Jang *et al.*, 2009, p. 107-108; Farley, Franzblau & Kennedy, 2014; Lim & Yoo, 2008, p. 65). For instance, one study estimated that 84% of women in prostitution had been under "third-party control or trafficked" (Farley *et al.*, 2014, p. 1042). That estimate was based on averaging the calculation of 18 different sources including government reports, research studies, and nonprofit agencies from India, the U.S., the European Union, Italy, Germany, Cambodia, Poland, the Netherlands, and others (Farley *et al.*, 2014, p. 1042). Likewise, many case examples demonstrate that criminals in the U.S. sex market profit from prostitution and sex trafficking (Jang *et al.*, 2009; *U.S. v. Reiner*, 2004; *U.S. v. Flores Mendez et al.*, 2013; *U.S. v. Kimmel*, 2005). Therefore, this study analyzed both

prostitution and sex trafficking cases to examine money laundering techniques used in the sex market.

First, this study used random sampling to collect 99 money laundering and prostitution related cases prosecuted between 1989 and 2018 in the U.S. (See Appendix A). Eighty-three out of 99 cases were prosecuted between 2000 and 2018. Fourteen were prosecuted between 1990 and 2000 and two in 1989. Twelve of them were prosecuted in state courts, and 87 were prosecuted in federal courts. The cases were then categorized by the ethnic backgrounds of the various criminal groups.

Second, the cases were examined to determine the techniques mentioned in the sample cases. The legal cases in this study included child sex trafficking, adult sex trafficking, prostitution, child pornography, child sex tourism, and prostitution-related Racketeer Influenced and Corrupt Organizations (RICO). The following documents were collected from the U.S. District Court and state courts nationwide: indictments; complaints; court transcripts; plea agreements; and summary judgments. In addition, this study collected and analyzed press releases from U.S. federal and state authorities, and news articles reporting police statements, arrest records, and unpublished indictments. In some cases, news articles and press releases from U.S. authorities were used as a source when legal documents were inaccessible to the public. Legal documents, press releases, and news articles provided more descriptive information about the laundering techniques used by criminals.

## FINDINGS

Case analysis found many similarities, but also differences, in criminals' money laundering techniques used in the U.S. sex market. Some similarities include payment methods, monetary tools, and types of assets purchased by criminals. However, the frequency or methods of their use differed depending on the criminals' ethnic backgrounds. For instance, although credit cards are the second most prevalent payment method used by criminals in U.S. prostitution (31 of 99 cases), this study did not find Chinese or Hispanic criminals accepting credit card for prostitution payments. Whereas a shell business is used by all criminals, the types of shell businesses differed depending on the criminals' ethnic background. (Appendix A describes all money laundering tools in 99 cases. Appendix B describes frequently used tools during the three stage of money laundering process.)

**Table 1: Criminals' Ethnic Background in Money Laundering Cases Used in the Analysis**

Domestic (U. S. Citizens	46
Korean	20
Chinese	11
Hispanic	12
Others	10
<b>Total</b>	<b>99</b>

Out of the 99 cases analyzed, 46 (46%) involved citizens of the U.S.—referred to as domestic in this paper—20 were Korean (21%), 12 were Hispanic (12%), 11 were Chinese (11%), and others (9%) (See Table 1).

The following section describes different money laundering methods used by criminals from all backgrounds.

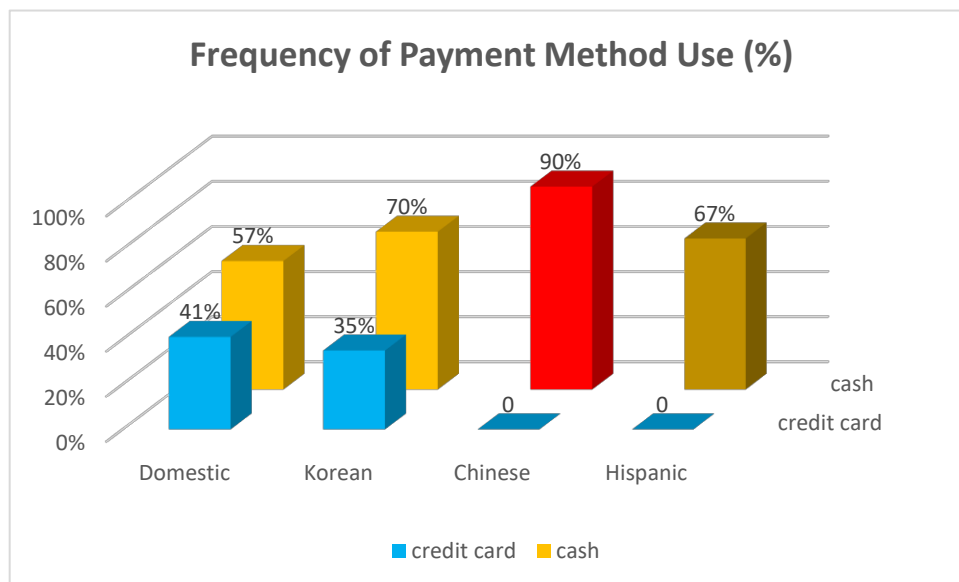
### Placement: Payment Techniques

From the case records it is clear that many criminals accept cash or credit card payments to process prostitution proceeds (See Appendix A). Out of 99 cases, 58 (58%) explicitly mentioned a reliance on cash transactions and 26 (26%) a reliance on credit card payments (Table 2). The following describes details of different payment methods used by various brothels operating in the U.S. as seen in the case files. Table 2 describes the number of cases indicating each payment method used by different ethnic groups.

**Table 2: Number of Cases Describing the Payment Methods by Ethnic Group**

Financial Institution	22	10	5	9	7
Credit Card	19	7	0	0	3
Cash	22	14	10	8	3

The frequency of each payment method used by criminal groups from different ethnic backgrounds by percentile are shown in Figure 1.



**Figure 1: Frequency of Payment Methods Used by Various Criminals Operating in the United States Sex Market**

## Cash

Criminals from all backgrounds who operate brothels often rely on cash transactions to conceal their illicit proceeds. In this study 58% (58 out of 99) cases revealed that criminals received cash for prostitution services (See Appendix A). In *U.S. v. Bowman* (2013), police arrested Harvey Bowman and his wife, Bobbie Bowman, for prostituting exotic dancers at his strip club in Alabama (*U.S. v. Bowman*, 2013). During the investigation, police found cash as prostitution payments on his business records (*U.S. v. Bowman*, 2013). In 2011, law enforcement indicted Tae San Won for running a *doumi* service,<sup>1</sup> a Korean call girl service supplying women for commercial sexual services to various venues in Fairfax, Virginia (*U.S. v. Won*, 2011). Won operated his business solely based on cash. He delivered *doumi* women to Korean karaoke bars in Northern Virginia upon individual client request. After entertaining the clients, women received cash for their services (*U.S. v. Won*, 2011). Lastly, Won also charged the *doumi* women \$100 per week for housing in one of his rental properties (*U.S. v. Won*, 2011). These examples suggest that cash transactions are common among many criminals in the commercial sex market.

Ninety percent (9 out of 11) of Chinese brothel cases examined accepted “cash only” payments (See Figure 1). Evidence suggests this may be attributed to the business practice widespread in mainland China (Using a credit card, 2018; Chatterjee & Miller, 2017; China Tech Insights, 2017, p. 20). For instance, credit card services are rarely available in China apart from major cities, such as Beijing (Using a credit card, 2018; Chatterjee & Miller, 2017). In many examined cases, police found cash in bulk when searching brothels or the owners’ residences (*U.S. v. Xu*, 2009; *State v. Jing*, 2017; *People v. Xuan*, 2011). In 2017, Juan Wang was arrested for money laundering and prostitution-related charges after operating an illicit massage parlor. Police found her carrying \$30,000 in cash duct-taped in her luggage. They also found \$60,000 in cash inside a security safe in her residence (Jechow, 2017). In 2016, Xiaoyao Wang was arrested for prostituting Chinese women in a massage parlor (Balaskovitz, 2016). Police found a total of \$300,500 in cash inside multiple safety deposit boxes, the source of which, according to the police, came from the prostitution business (Balaskovitz, 2016).

## Credit Cards

This study found that 31% (31 out of 99) of cases described criminals conducting illicit transactions through credit card services (See Appendix A). Twenty-nine out of 31 cases mentioned credit card services as a specific payment method used by the criminals (See Table 2; Appendix B). Case analysis also shows that many criminals rely on diverse methods of credit card use depending on their ethnic backgrounds. For instance, whereas many Korean parlors accept credit card payments under their massage parlor business names, many domestic brothels process credit card payments through a third-party account. Also, case analysis shows that many Chinese criminals limit their credit card use to paying for operational expenses (*U.S. v. Fong et al.*, 2014; *U.S. v. Rogers*, 2010).

### Credit Card Payments in U.S. Domestic Brothels

This study found that 16% (3 out of 19) of the cases involving U.S. operators relied on a third-party credit card payment processor. Many credit card companies

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<sup>1</sup> *Doumi* literally means “helper.” In the context of prostitution it means a Korean call girl service that supplies women to different prostitution venues, such as Karaoke.

have a policy against businesses used as a front for brothels in the U.S.; hence, brothels hire a third-party entity to receive credit card payments for prostitution (Chatterjee & Miller, 2017). For instance, in *U.S. v. Marren* (1989), a night club owner, Marren, hired Gervais, a broker, to obtain a merchant account and receive credit card payments for prostitution (*U. S. v Marren*, 1989). Gervais provided illicit financial services to multiple brothel owners including Marren (*U.S. v. Marren*, 1989). He gave brothels fictitious names so the brothel owners could accept Visa or Mastercard payments from their sex buyers (*U. S. v. Marren*, 1989). In turn, Gervais charged the brothels 15% of their total transaction amounts for prostitution (*U.S. v. Marren*, 1989). In *U.S. v. Pararas-Carayannis*, George Pararas-Carayannis was indicted after aiding many brothels in illegal transaction schemes. Pararas-Carayannis granted brothel owners access to his company's merchant account to give them the ability to process credit card transactions for prostitution (*U.S. v. Pararas-Carayannis*, 1996). His fee ranged between 25% and 30% per transaction.

### **Korean Parlors**

Case analysis illustrated that criminals operating Korean parlors are more likely to accept credit card payments than those operating other Korean brothels, including *doumi* services (*U.S. v. Lee*, 2009; *U. S. v. St. George*, 2003; *U.S. v. Patterson*, 2008; *People v. Yoonung et al.*, 2014; *U.S. v. Won*, 2011). Fifty-five percent (6 out of 11) of the Korean parlor cases mentioned credit cards as their method of receiving prostitution payments. In *United States v. Patterson* (2008), Mi Ra Patterson prostituted Korean women in an illicit parlor. When sex buyers entered Patterson's parlor, the masseuses took them to a back room where they negotiated prices for sexual services with the masseuses. Many buyers paid for those services with credit cards or cash (*U.S. v. Patterson*, 2008). Similarly, in *United States v. Lee* (2009), Kenneth Lee was prosecuted for exploiting Korean women through commercial sex in his spas. After paying an entrance fee to the receptionist, Lee's customers entered individual rooms to negotiate prices for sex with the masseuses (*U.S. v. Lee*, 2009). As in the case of Patterson, Lee's customers paid for their prostitution services with credit cards or cash (*U.S. v. Lee*, 2009).

### **Chinese Brothels**

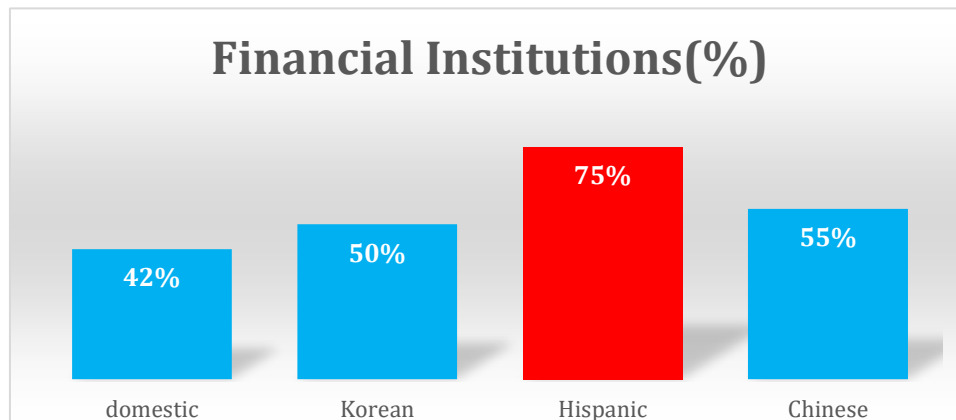
Unlike Korean or domestic brothel owners, only 18% (2 out of 11) of Chinese cases indicated credit card use by the brothel owners. Their credit card use was also limited to payment for operational expenses. For instance, in *U.S. v. Wang et al.* (2017), while solely accepting cash as payment for prostitution, Fang Wang used her credit card to pay for advertisements on Backpage.com (*U.S. v. Wang et al.*, 2017). In *U.S. v. Fong et al.* (2014), Allen Fong directed his associates to use his credit card under their names to purchase condoms online (*U.S. v. Fong et al.*, 2014). On another occasion, Fong used his credit card to purchase 2000 condoms online which were delivered to another associate's residence (*U.S. v. Fong et al.*, 2014). He then used money orders and checks to pay off his credit card bills (*U.S. v. Fong et al.*, 2014).

### **Financial Institutions**

Case analysis revealed that criminals from all backgrounds use U.S. financial institution services to process their prostitution proceeds (See Figure 2). Out of 99 cases, 53% (53) mentioned criminals using bank accounts or wire transfer services to process their illegal proceeds (See Appendix A). Also, 75% of Hispanic cases



mentioned criminals use of financial institution services followed by 55% of Chinese, 50% of Korean, and 42% of domestic brothel cases (See Figure 2).



**Figure 2: Money Laundering Methods Using Financial Institutions by Ethnicity**

### Wire Transfer Services

This study found that 78% (7 out of 9) of Tenancingo (Hispanic) cases used victims' identifications for money transfer services, like Western Union, to launder their prostitution proceeds. Tenancingo is a Hispanic brothel model which originated in Tenancingo, Mexico (*U. S. v. Flores-Mendez et al.*, 2013; *U. S. v. Consuelo Carreto Valencia*, 2009; *U. S. v. Severiano Martinez-Rojas et al.*, 2015; HIS Investigation leads Extradition, 2012). In 2014, Antonio Lira-Robles used his victims' false identifications to launder prostitution proceeds to Mexico through various Western Union locations. Likewise, in 2012, Benito Lopez-Perez and his associates used their victims' false identifications and Western Union to transfer their sex trafficking proceeds to Lopez-Perez's family in Mexico (HIS investigation leads extradition, 2012).

### Domestic Brothels Business Accounts

Some domestic brothels use business accounts to process their prostitution proceeds. This study found 45% (9 out of 20) of the domestic brothel cases used business accounts to process their illicit proceeds. In 22% (2 out of 9) of the cases criminals created accounts as nonprofit organizations. For instance, in *U.S. v. Orlando* (2002), Lawrence Orlando and Tera McDaniel opened a business account through their shell corporation and they deposited their cash proceeds into that account (*U.S. v. Orlando*, 2002). In *U.S. v. Fedele et al.* (2010), Jason Fedele used multiple bank accounts to process cash prostitution proceeds. Fedele used numerous fraudulent identifications to open various accounts at different banks. He then directed the women in prostitution to transfer their earnings into his accounts using Money Gram (*U.S. v. Fedele et al.*, 2010). In *U.S. v. Baker* (2000), Everette Baker operated multiple brothels including massage parlors and a night club. Baker established dummy checking accounts to use for credit card clearinghouses to launder his illicit proceeds (*U.S. v. Baker*, 2000). He also placed the Mayor's daughter on his payroll and lavished her with holiday bonuses (*U.S. v. Baker*, 2000). In *Posner v. City of New York* (2014), the defendant, Posner, created a nonprofit organization, "Voter March," which sold T-shirts, tapes, and books for

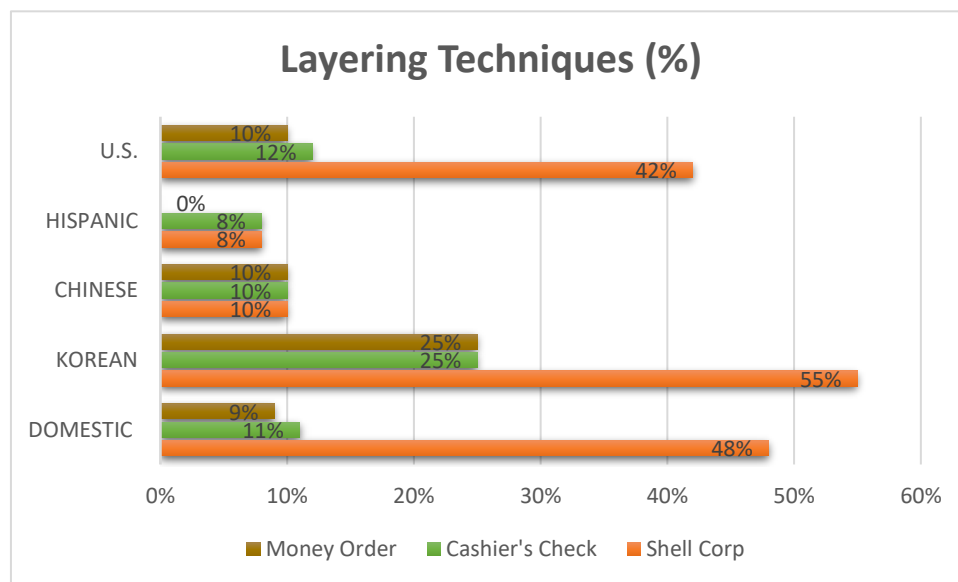
campaigns. He used the nonprofit account to process prostitution proceeds (*Posner v. City of New York*, 2014).

### **Chinese Residential Brothels**

In the cases analyzed, Chinese brothel owners used local bank services through their associates' accounts. This study found 18% (2 out of 11) of Chinese cases involving residential brothel networks used local bank services to launder prostitution proceeds. In *U.S. v. Fong et al.* (2014), Allen Fong operated multiple residential brothels in California. He employed and designated several associates as nominal lessees for his residential properties. Fong also managed bank accounts and credit cards under his associates' names. On one occasion, he directed his associates to order condoms using their credit cards. He also gave them money orders and cashier's checks to pay for each property's utility bills and rent (*U. S. v. Fong et al.*, 2014). On multiple occasions, using his associates' accounts, Fong also made international wire transfers to China and opened a joint account to manage financial activities involving his brothel operation (*U. S. v. Fong et al.*, 2014). In *State v. Jing* (2017), Hong Jing was indicted after trafficking women in several states including North Dakota, New York, and Minnesota. Jing's associates collected cash proceeds from several brothels and wire transferred the money into Jing's account. On one occasion, an associate was directed to deposit cash proceeds into the accounts of Jing and his co-conspirators. Jing's associates conducted cash deposits at multiple Wells Fargo branch offices located in multiple states. The deposits were then wire transferred to Jing's account in California. In one instance, police found evidence of wire transfers from Jing's associates' checking account to his own which Jing used to purchase one of his residences in California (*State v. Jing*, 2017).

### **Layering Techniques Using Shell Businesses**

Criminals from all backgrounds use various tools to disguise their illicit profits. However, case analysis showed that Korean criminals are more likely to use cashier's checks or money orders than others to conceal their illicit proceeds (See Figure 3). In cases involving Korean criminals, 55% (12 out of 20), had the highest indication of shell business formation, followed by domestic criminals 48%, Chinese, 10%, and Hispanic 8% (Figure 3). Both Korean and domestic criminals also had higher indication of shell business formation, (42%) as a whole (See Figure 3). Also, out of 10 cases indicating criminals' use of money orders, five dealt with Korean criminals, four domestic, and one Chinese. Whereas this study found 10% of 99 U.S. cases indicating criminals' use of money order, zero cases of Hispanic criminals were found to use money orders (See Figure 3).



**Figure 3: Frequency of Layering Techniques Used by Criminals from Different Ethnic Backgrounds**

### Korean Brothels

Whereas 58% (7 out of 12) of the Korean cases indicated that spa or massage parlors used a shell corporation, 42% (5 out of 12) of other cases suggest that some Korean criminals may integrate illicit practices from their native country into their operation in the U.S. (Lee, 2015; Lee, 2017; Kim, 2012; Park, 2014; Lee, 2002). For instance, wholesale clothing markets are commonly used by money launderers in the Korean underground economy (Lee, 2015; Lee, 2017; Kim, 2012). Also, criminals in South Korea frequently use private piano lesson businesses for tax evasion or other financial crimes (Jade, 2017; Mabari23, 2017; Fragrance, 2017; Glee18, 2010). For example, police arrested Hyun Ok Yoonung for running a residential brothel at a luxury apartment in New York in 2014 (*People v. Yoonung et al.*, 2014). Yoonung used multiple shell businesses to process credit card transactions (*People v. Yoonung, et al.*, 2014). Her shell businesses were cash-intensive and included a clothing wholesaler (Kim, 2014; Hwang, 2017; *People v. Yoonung, et al.*, 2014). Likewise, in 2016, Ryan Kim was convicted of providing illicit advertising services to multiple Korean brothels in New York (*U.S. v. Kim et al.*, 2016). To conceal the nature of his illegal operations, Kim and his mother opened a shell business providing private piano lessons. He also hired an accountant who was directed to use the shell business for tax fraud (*U.S. v. Kim, et al.*, 2016).

### Location of Domestic Brothels

Case analysis showed that in 18% (4 out of 22) of cases, the location of domestic brothels can affect the industry of the shell business formed. In *U.S. v. Montague* (1994), Mara Beth Montague operated several escort services in St. Louis, Missouri, a center of major horse industries in the U.S. (*U. S. v. Montague*, 1994; CBT Staff, 2009; Paynter, 2001). She opened multiple corporate accounts under her fictitious horse supply business, promising her buyers with "a guaranteed discretion" (*U.S. v. Montague*, 1994). By using her shell business accounts, she disguised her buyers' prostitution payment history from their credit card statements (*U.S. v. Montague*, 1994). In *U.S. v. Reiner* (2004), the investigator found Gary Reiner prostituting multiple women in his wellness center. His wellness center offered

both massage and prostitution. The business was located in Kittery, Maine, a small town renowned for tourist attractions and outlet malls (Kerr, n.d.). He and his co-conspirators partnered with many sex traffickers to prostitute multiple victims in his wellness center (*U.S. v. Reiner*, 2004). Given that wellness centers or massage parlors are commonly located in outlet malls, he formed shell businesses named, among others, Kittery Health Club, Inc. to launder his illicit proceeds (*U.S. v. Reiner*, 2004; *Massage Parlor Investigations Ends*, 2018; Rohr, 2018; White, 2018). In 2015, Michael Rivera was convicted of trafficking women and children in Brownsville, New York (*U.S. v. Rivera, et al.*, 2015). Given that tattoo shops are prevalent in the area, Rivera opened a tattoo shop and prostituted his victims to stay under law enforcement's radar (*U.S. v. Rivera, et al.*, 2015; Google, 2018).

### **Client Protection**

Other domestic brothels (10%) may name their shell businesses primarily to protect their clients. For instance, in *U.S. v. Brener et al.* (2008), Michael Brener operated a high-class escort service in New York City (*U.S. v. Brener et al.*, 2008). Brener formed a shell business named QVC Consulting, Inc. and listed the prostituted women as its consultants (*U.S. v. Brener, et al.*, 2008; Hakim & Rashbaum, 2008). His clients mainly included high profile individuals like Eliot Spitzer, former governor of New York State (*U.S. v. Brener et al.*, 2008; Hakim & Rashbaum, 2008). The women prostituting for Brener often promised the buyers that their transaction history would be protected from showing on their financial statements (*U.S. v. Brener et al.*, 2008). Therefore, while charging his clients \$1000 per hour, Brener ensured that their purchasing history would appear as consulting services provided by QVC Inc. (*U.S. v. Brener, et al.*, 2008). In 2007, Debora Palfrey created a shell corporation named "Pamela Martin and Associates" (*U.S. v. Palfrey*, 2007). Though her office was located at her residence in Vallejo, California, her brothel primarily operated in the Washington, D.C. Metro area. Palfrey recruited and sold young women for prostitution in Washington D.C. to wealthy politicians and government contractors (*U.S. v. Palfrey*, 2007). Palfrey, like Brener, listed the prostituted women as associates in her shell corporation and disguised the illegal prostitution transactions as consulting services offered to political figures (*U.S. v. Palfrey*, 2007).

### **Integration Techniques**

This study found that criminals from all backgrounds often purchase assets for different reasons. Out of 99 cases, 26 cases indicated that criminals purchased assets with prostitution proceeds. However, 21 out of 26 cases indicated that the criminal purchased assets as a part of the integration technique, a method to reintegrate illicit profit into the legal economy (see Appendix B). Out of those 21 cases, 52% (11) involved real estate investments, 33% (7) included automobile purchases, and 14% (3) other purchases. Also, whereas some brothel owners solely invest in the U.S. domestic market, others transferred their prostitution proceeds to their native countries.

The following sections describes different ways that criminals manage their illicit earnings from prostitution in the U.S.

### **Real Estate**

This study found that real estate investment is the most common method of integration used by criminals operating in the U.S. sex market. Of 21 cases, 52%(11) criminals purchased real estate with their illicit earnings from prostitution. In *U.S.*

*v. Taylor (2001)*, the defendant attempted to close on a home in Las Vegas with the proceeds from his child sex trafficking operation. Borrowing \$5,500 from his real estate broker, he purchased a cashier's check for \$16,500 (*U.S. v. Taylor*, 2001). In 2011, Richard Costanzo pled guilty to prostitution-related offenses committed between 1997 and 2009 (Kulper, 2011). Costanzo purchased his \$300,000 home in a gated community along with other assets with his prostitution proceeds (*U.S. v. Costanzo*, 2011; Kulper, 2011). In *People v. Rukasov* (2008), police arrested Alexander Rukasov for running multiple escort services prostituting Eastern European women in New York City. Investigators found Rukasov to have corporate and real estate investments in Florida, Maryland, and Maine (*People v. Rukasov*, 2008).

### **Luxury Vehicles**

Some criminals purchased luxury vehicles with their prostitution proceeds. Of the 21 cases, this study found seven (33%) in which criminals owned multiple luxury vehicles. For instance, in *U.S. v. Kimmel* (2005), police seized nine vehicles, including two new Mercedes, a Lexus, and an Audi (*U.S. v. Kimmel*, 2005). The police also found records indicating Kimmel previously owned and sold additional luxury vehicles (*U.S. v. Kimmel*, 2005). In 2016, police found that Ryan Kim purchased a BMW and a Porsche with his illicit earnings (Shiheungdong Korean American arrested, 2016). Lastly, in *U.S. v. Huang et al. (2017)*, investigators found Huang commuting between her residence and brothel driving a Porsche and a new BMW (*U.S. v. Huang et al.*, 2017).

### **Other Assets**

Other criminals used the stock market or luxury item purchases to disguise their prostitution proceeds. Some criminals purchased stocks with their illicit earnings. In *U.S. v. Ryan Kim, et al. (2016)*, Ryan Kim told his mother that his stock market investment is not likely to be discovered by law enforcement (*U.S. v. Ryan Kim et al.*, 2016). In *U.S. v. Palfrey* (2007), investigators found over \$2.7 million in Palfrey's Charles Schwab investment account (*U.S. v. Palfrey*, 2007). In other cases, the criminals purchased various luxury items to conceal their prostitution proceeds (Associated Press, 2004; *U.S. v. Huang, et al.*, 2017). In *U.S. v. One Rolex Watch, et al. (2017)*, police found jewelry and multiple luxury items in Sun Im Mount's residence. The items included a Rolex watch, a Gold Belex watch, two Cartier watches, a Cartier ring, and a Piaget watch (*U.S. v. One Rolex Watch, et al.*, 2017).

## **DISCUSSION**

The U.S. sex market consists of criminals from different regions including the U.S., Latin America, Asia, and Eastern Europe. They use cash, shell businesses, or credit card services to launder prostitution proceeds. The following section discusses current efforts by the U.S. authorities to combat financial crimes in the commercial sex market. It also provides recommendations to strengthen their efforts in the fight against money laundering in the commercial sex market.

### **Federal Law**

U.S. federal law allows law enforcement to prosecute traffickers and brothels by means of money laundering charges (Project STAMP, 2018). The law penalizes offenders with a fine of up to \$500,000 or a prison sentence of up to 20 years (Title 18, U.S.C. §§ 1956, 1957). It also allows law enforcement to seize any property traceable to those involved in a transaction or "attempted transaction" of criminal

activity (Title 18 USC 1956, 1957). As the lucrateness of the U.S. sex market attracts many criminals from all backgrounds in local jurisdictions across the country, (Lopez, 2016; Jang *et al.*, 2009; *U. S. v. St. George*, 2003; *U. S. v. Taylor*, 2001) it is vital for authorities to adopt stronger anti-money laundering efforts to combat money laundering in local sex markets.

### **Asset Forfeiture and Restitution**

Evidence suggests that criminals' illicit earnings often remain hidden from law enforcement even after the conclusion of an investigation. This study found that 26% of the 99 cases uncovered by law enforcement included illicit assets. Sex trafficking victims, in many cases, thus will be left with no compensation even after their offenders are convicted for their crimes (Zimmerman, 2013, p. 8). Whereas criminals often reap lucrative benefits from prostituting women and children, many U.S. anti-trafficking professionals and law enforcement officers continue to face challenges because of the limited resources available to them (Dale & Levesque, 2017, p. 14). In particular, lack of restitution and the availability of recovery resources often leads to revictimization (Mehlma-Orozco, 2016; Clawson, Dutch, Salomon, & Grace, 2009, p. 35). Likewise, law enforcement officers often receive insufficient training and are faced with limited resources to appropriately combat money laundering in the U.S. sex market (Dale & Levesque, 2017, p. 14; Clawson, Dutch & Cummings, 2006, p. 33).

### **Financial Crime Enforcement Network**

The U.S. Treasury Department's Financial Crime Enforcement Network (FinCEN) provides guidelines and regulations to protect financial institutions from being exploited by money launderers (U.S. Department of Treasury, n.d.). In 2014, FinCEN published a report to enhance its effort against money laundering and human trafficking, which includes sex trafficking organizations operating in the U.S. sex market (FinCEN, 2014). Although the current efforts have brought some success, a more thorough list of typologies is necessary to further FinCEN's ongoing efforts.

The following section describes FinCEN's current efforts against money laundering and human trafficking, examines its shortcomings, and provides recommendations to strengthen its ongoing fight against the commercial sex market.

### **Financial Crime Enforcement Network's 2014 Report**

In 2014, FinCEN published a report to assist financial institutions in combating money laundering and human trafficking. The report described the definition of human trafficking, the difference between trafficking and smuggling activities, and a list of red flags indicating signs of potential money laundering activities by trafficking organizations (U.S. Department of Treasury, n.d.). It also described ways that law enforcement personnel could identify traffickers and victims on a daily basis (U.S. Treasury, 2014, p. 4). Lastly, the report included common terms to be used when reporting potential trafficking transactions on the Suspicious Activity Reports (SARs) (U.S. Treasury, 2014, Appendix B). Examples of transactional red flags included inconsistencies in payroll, expenditures with the business lines, substantial deductions to wages, and payroll checks deposited into the employer's account (U.S. Treasury, 2014, Appendix B).

### **Segmented Representation of the Market**

Evidence suggests that FinCEN's 2014 report may only address a segment of the criminal organizations operating in the U.S. sex market. For instance, the

report elaborates on many ways that law enforcement personnel can identify potential trafficking activities (U.S. Treasury, 2014, Appendix B). The red flags included a customer opening an account when escorted by a third party, a common signer in unrelated businesses or accounts, and similar information used to open multiple accounts (FinCEN, 2014, Appendix B). These red flags address some domestic sex trafficking activities. However, they are unlikely to address other sex trafficking organizations operating in the U.S. (Polaris, 2018, p. 28; Dooley, 2012; *U.S. v. Morris et al.*, 2017) For instance, this study found that many Asian parlor owners often rely on brokers or associates rather than victims to conduct financial transactions (*U.S. v. Fong et al.*, 2015; Hernandez, 2017). Also, this study found no criminals operating *Cantina*, a Hispanic brothel model operating as a bar, using their victims to conduct transactions in financial institutions (*U.S. v. Hortencia Medeles Arguello et al.*, 2016). Instead, many *Cantina* and Asian sex trafficking cases indicated that criminals used family members, brokers, credit card companies, shell corporations, or real estate agents to process their prostitution proceeds. (*U.S. v. Arguello, et al.*, 2016; *U.S. v Taylor*, 2001; *U. S. v. Kim et al.*, 2016; *U.S. v. Dubogrysov*, 2007; *People v. Rukasov*, 2008; *People v. Yoonung et al.*, 2014). Evidence also showed that many brothels profiting from sex trafficking activities also benefit from selling women who are willingly participating in prostitution (*U.S. v. Reiner*, 2004; *U.S. v. Hortencia Medeles Arguello et al.*, 2016). Hence, combating sex trafficking organizations mandates addressing the commercial sex market as a whole. Nonetheless, FinCEN's 2014 report provided no guidelines in addressing these entities and their money laundering techniques. Hence, it is vital that financial institutions implement more comprehensive guidelines to address the problem as a whole.

### Closer Monitoring System

The evidence further reveals that FinCEN needs a closer monitoring system to develop appropriate strategies to combat money laundering in the U.S. domestic sex market. For instance, the 2014 report recommends that financial institutions subscribe to the Trafficking in Persons (TIP) and the 2011 Financial Action Task Force (FATF) reports to identify countries with a higher risk of human trafficking. It also states that financial institutions should monitor "frequent outbound wire transfers" to these countries (FinCEN, 2014, Appendix B). However, neither report is sufficient to address changing criminal techniques used in the U.S. sex market (Jang *et al.*, 2009, p. 87; Chang, 2015; Lee, 2011; *U.S. v Marren*, 1989; *U.S. v. Kinzler*, 1995). For instance, in 2006, the TIP report recognized South Korea as a Tier 1 country (Trafficking in Persons Report, 2006). Ironically, that same year the U.S. Attorney General identified the highest number of foreign sex trafficking victims as coming from South Korea (Trafficking In Persons Report, 2006; Lim & Yoo, 2008). Also, whereas the 2017 TIP report continuously recognizes South Korea as a Tier 1 country, evidence shows that many criminals persistently victimized Korean women through commercial sex in the U.S. (Trafficking in Persons Report, 2017; Nestel, 2018; Carvalho, 2018, p. 29).

Similarly, the 2011 Financial Action Task Force (FATF) report refers to the 2006 United Nations Office on Drugs and Crime (UNODC) report identifying countries with a high risk of human trafficking (FATF, 2011, p. 19). The UNODC report recognized Russia and China as two of many countries with the highest risk of human trafficking and categorized the United States as a country with low risk of human trafficking (FTAF, 2011, p. 19). Nonetheless, this study found that the highest number of brothel cases (44%) in the U.S. involved U.S. citizens exploiting

American women and children while only two cases involved Russian organizations prostituting Russian citizens (*U.S. v. Dubogrysov*, 2007; *People v. Rukasov*, 2008). Also, many criminals in the U.S. sex market alter their techniques based on changes in law enforcement or policy mechanisms (*U.S. v. Kim et al.*, 2016; Jang *et al.*, 2009, p.87; Chang, 2015). In addition, some brothel owners hire brokers to find loopholes in policy changes or law enforcement tactics (Jang *et al.*, 2009, p. 87; Admin, 2017). Nonetheless, the 2006 UNODC report does little to assist financial institutions in identifying the changing tactics used in the U.S. domestic sex market. Hence, FinCEN should implement a closer monitoring system to more appropriately combat money laundering in the U.S. sex market.

### State Laws

Many cases will be heard in state courtrooms, and evidence shows that different states take various approaches when combatting money laundering (Geoffrey, n.d.). Some local authorities view money laundering solely as a federal crime whereas others criminalize money laundering with a relatively small fine (Indiana Code Title 35. Criminal Law and Procedure § 35-45-15-5; ORS 164.170).

The following section describes various legislative approaches used by different state authorities to combat financial crimes in their local sex markets. It also examines their shortcomings and provides recommendations to strengthen their current efforts.

### Lack of State Laws

Evidence suggests that lack of local anti-money laundering provisions may hinder the efforts to fight money laundering in some state sex markets (Geoffrey, n.d.). For instance, money laundering is solely a federal crime in Nevada and Georgia. However, as of 2018, Las Vegas, Nevada has over 200 massage parlors illicitly prostituting Asian women (Rubmap.com, 2018). What's more, Las Vegas is said to be one of the most popular destinations for child sex traffickers in the U.S. (Lopez, 2016; Ludenberg, 2017; O'Neal, 2017). Similarly, the state of Georgia has over 300 illicit massage parlors offering sexual services (Rubmap.com, 2018). In particular, Atlanta, Georgia, is thought to be a well-known hub of child sex trafficking in the U.S. (Griffin, 2018; Petchenik, 2018). Though sex trafficking carries harsh penalties in both jurisdictions, the lack of a state anti-money laundering law makes it difficult to prosecute traffickers without victims' testimonies. Hence, it becomes more difficult to hold the traffickers accountable when adult victims are trafficked within the state border. The law requires adult victims to prove evidence of coercion, deception, or force to prove their victimization (Fleming, 2013). When victims' testimonies are unavailable, the state authority can use its anti-money laundering law to hold traffickers accountable with harsh penalties. However, states lacking an anti-money laundering law, like Nevada or Georgia, diminish the opportunities for prosecutors to hold traffickers responsible for their crimes (Ragan; 2013; Barker, 2018; Casun, 2017; D'Angelo, 2018; McKenzie, 2018; Long, 2018; Las Vegas Defense Group, n.d.; Powell, 2016; Booth, 2010; Long & Garvey, 2012; McKenzie, 2018; Long, 2018).

### Small Fines

Some states treat money laundering as a serious crime but only impose a relatively small fine. As a result, the light penalty often creates incentives for brothels to operate in the local sex market. For instance, in Texas, money laundering is a felony crime that carries a sentence of life in prison but with a relatively small fine



of up to \$10,000 (Money Laundering Acts of 1993). In many Asian parlor cases, brothel owners often hire nominal owners to avoid potential jail time while only having to pay the small fine for operating their brothels (Jang *et al.*, 2009, p. 82; *U.S. v. Merriman*, 1999; *U.S. v. Fong et al.*, 2015). Also, whereas many brothels annually profit between \$500,000 and \$1,000,000, a \$10,000 fine is unlikely to have a deterring effect on those brothel owners (*U.S. v. Riedl*, 2003; Jang *et al.*, 2009, p. 82). Therefore, it is vital for state authorities to impose fines commensurate with the amount of illicit revenue generated by the brothels operating in their jurisdiction.

## Conclusion

The U.S. commercial sex market consists of criminals from different regions, Asian, Hispanic, and European countries, often using different money laundering techniques adopted from their countries or origin. Although some scholars in the past have recognized the importance of anti-money laundering efforts to combat the U.S. sex market problem, little to no information is available to identify different money laundering techniques used by criminals in the U.S. sex market. It is necessary to take a more vigilant approach in addressing the problem of money laundering in the U.S. commercial sex market. Further policy changes are necessary to solve the problem in state and local jurisdictions. Lastly, it is vital to improve current monitoring systems to identify money laundering techniques used in the U.S. sex market.

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APPENDIX A  
ALL MONEY LAUNDERING TOOLS IN U.S. CASES IN THIS STUDY  
X=Mentioned in the Case

CASE NAME	Gambling Casino	Shell Corp.	Financial Institutions	Mail Courier	Cashier's Check	Assets Purchase	Credit Card	Money Order	Cash	Virtual Currency
U.S. v. Petix										X
U.S. v. Moore										
US. v. Harding										
U.S. v. Walker			X		X	X			X	
U.S. v. Riedl			X	X	X					
U.S. v. Gable			X				X			
U.S. v. Costanzo		X				X			X	
U.S. v. Carter	X								X	
U.S. v. Chaiban										
U.S. v. Blair					X	X	X	X	X	
U.S. v. Stasior										
U.S. v. Daniels		X								
U.S. v. Rivera		X								
U.S. v. Kinzler		X	X				X			
U.S. v. Baker		X	X				X			
Cikraji v. Vickers		X	X							
U.S. v. Owens	X		X							
U.S. V. Baston			X						X	

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[illegible]

[illegible]

APPENDIX B  
FREQUENTLY USED MONEY LAUNDERING TECHNIQUES BY PLACEMENT,  
LAYERING AND INTEGRATION

X= Technique Used in the Case

CASE NAME	<u>PLACEMENT</u>			<u>LAYERING</u>			<u>INTEGRATION</u>	
	Cash	Credit Card	Shell Corp.	Cashier's check	Money Order	Assets Purchase		
US v Petix								
US v Moore								
US v Harding								
US v Walker	X			X			X	
US v Riedl				X			X	
US v Gable		X						
US v Costanzo	X		X				X	
US v Carter	X							
US v Chaiban							X	
US v Blair	X	X		X	X		X	
US v Stasior								
US v Daniels			X					
US v Rivera			X					
US v Kinzler		X	X					
US v Baker		X	X					
Cikraji v Vickers			X					

[illegible]



[illegible]

US v Chang Young Kim et al		X	X		X
Johnson v Walton	X	X			
US v Surh, et al		X			
US v Yeon Sook Hwang		X			
US v Eun Sook Chang et al	X	X			
US v Rolex Watch (Sun Im Mount)	X	X	X	X	X
US v Patterson		X		X	
US v Kim et al		X		X	X
Peacock v CIR				X	X
US v Hogan	X		X		
US v Cha et al		X			
US v Lopez-Perez	X	X			
US v Antonio Lira- Robles	X				
US v Isaías Flores- Medez	X				
US v Medeles-Ar- guello	X	X	X		X
US v Arami					X
US v Martinez- Rojas					

US v Valencia	X
US v Flores	X
US v Maria Roja	X
US v Notario	X
US v Ocha	
US v Laines	
US v Melendez-Gonzales	X
US v Fong et al	X
US v Huang et al	
US v Hongyan Li	X
US v Wang (2015)	X
US v Tee	X
US v Wang et al (2017)	X
People v Mei Jun Wang (2011)	X
US v Xu	X
US v Jing	X
US v Aboulafia et al	X
Wen Chen	X

US v Dubogrysov et al	X	X	X	X	
People v Rukasov	X		X	X	
People v Fetissova			X		
US v Liberty Reserved					
US v Hurant et al	X	X	X		
US v Payza					
US v Baston					
US v Nguyen		X			
US v Akuiyibo			X		
US v Morris et al	X				
Total	58	29	43	10	21