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Abstract

This study describes tax evasion or fraud in the United States sex market. Prior to this study, scholars have recognized the problem of tax evasion in the commercial sex market as an obstacle to national revenue collection. Tax violation and fraud investigations also are ways to combat the illegal commercial sex industry. However, no studies have focused on the problem in the United States sex market. Hence, this study aims to describe tax evasion or fraud methods used by the criminals operating in the United States sex market. This study relies on both quantitative and qualitative methods to examine the problem. This study documents and describes U.S. federal and local cases of tax evasion and prostitution-related activities. This study argues that many victims and survivors of commercial sexual exploitation do not receive restitution even after their perpetrators' prosecution. Therefore, this study recommends that law enforcement proactively investigates all criminals committing tax evasion or fraud in the U.S. sex market. It also recommends that law enforcement seizes all criminals' illicit assets and uses them for anti-trafficking efforts and resources for survivors and victims.

Keywords

sex trafficking, prostitution, tax evasion, facilitators, tax fraud, organized crime, restitution

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TAX EVASION AND FRAUD IN THE UNITED STATES SEX MARKET

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ABSTRACT

This study describes tax evasion or fraud in the United States sex market. Prior to this study, scholars have recognized the problem of tax evasion in the commercial sex market as an obstacle to national revenue collection. Tax violation and fraud investigations also are ways to combat the illegal commercial sex industry. However, no studies have focused on the problem in the United States sex market. Hence, this study aims to describe tax evasion or fraud methods used by the criminals operating in the United States sex market. This study relies on both quantitative and qualitative methods to examine the problem. This study documents and describes U.S. federal and local cases of tax evasion and prostitution-related activities. This study argues that many victims and survivors of commercial sexual exploitation do not receive restitution even after their perpetrators' prosecution. Therefore, this study recommends that law enforcement proactively investigates all criminals committing tax evasion or fraud in the U.S. sex market. It also recommends that law enforcement seizes all criminals' illicit assets and uses them for anti-trafficking efforts and resources for survivors and victims.

KEYWORDS

United States, sex trafficking, prostitution, tax evasion, fraud, facilitators, tax fraud, organized crime, restitution

This study is aimed to describe tax evasion or fraud in the commercial sex market in the United States. The commercial sex market is a lucrative industry. In the U.S., the estimated annual revenue of the illicit massage parlor industry alone was \$2.5 billion in 2018 (Human Trafficking in Illicit Massage Business, 2018, p.10). However, many victims and survivors of commercial sexual exploitation often remain vulnerable to economic hardship and limited resources even after the rescue (Bocinski, 2017, p. 3; Gardiner, 2021). For instance, in 2020 in the U.S., fewer than 50% of the sex trafficking cases included the mandatory restitution granted to the trafficking victims after the conviction of their perpetrators (Feehs & Wheeler, 2021, p.5).

Tax fraud occurs when a criminal or criminal organization intentionally fails to pay taxes due to the government (Weisberg, 2018). Tax evasion uses illegal ways to avoid paying tax by intentionally misrepresenting taxable income (Tax evasion, n.d.; Weisberg, 2018). Tax evasion is also considered tax fraud or violation (Weisberg, 2018). Tax evasion or fraud is one way criminals increase their illicit gain from the commercial sexual exploitation of men, women, and children. Whereas many victims face limited resources to rehabilitate their lives after the rescue, one can argue that illicit profit in the commercial sex market could be utilized for the victim's needs for

their rehabilitation (Bocinski, 2017, p. 3). One study in the Netherlands found that some human trafficking victims do not receive compensation because of law enforcement's insufficient financial investigation to uncover the illicit assets (Cusveller & Kleemans, 2018).

As both law enforcement officers and policymakers need to understand the problem, this study aims to uncover the tax evasion tactics used by criminals in the U.S. sex market. In doing so, this study aims to assist the anti-trafficking professionals in identifying better and utilizing the criminals' assets as resources for the victims' and survivors' needs. Also, this study aims to shed light on the importance of combating tax fraud by criminals exploiting women and children through commercial sex.

BACKGROUND

Some scholars have investigated tax evasion focusing on the loss of national revenue (Tabandeh, Jusoh, Nor, & Zaidi, 2012; Ciupitu, 2016). However, they did not provide insights on the tax evasion or fraud tactics used in the U.S. sex market.

Buehn and Schenider (2010) estimated the size of tax evasion in 38 Organization of Economic Cooperation of Developed (O.E.C.D.) countries between 1999 and 2010. While the commercial sex market accounted for a portion of the underground economy in the 38 countries, the study focused on measuring the size of tax evasion in 38 countries rather than investigating the problem of tax evasion in the sex market. Neither did they provide specific analysis on the tax evasion in the U.S. sex market. As a developed nation, the U.S. was part of the sample country analyzed in their study.

Ciupitu (2015) argued that the primary purpose of a fiscal system is to secure the source of the public revenue, and the public taxes must be used to support the country's economic development and serve the needs of marginalized groups in the society. Hence, Ciupitu stressed combating tax evasion to accomplish those goals. Ciupitu discussed the commercial sex market as an underground economy in various countries. However, he did not elaborate on the problem surrounding tax evasion in the commercial sex market.

Other scholars have examined the factors affecting tax evasion in many countries worldwide. For instance, one study (Tabandeh, Jusoh, Nor, & Zaidi, 2012, p. 1524) argued that tax evasion hindered a government from allocating revenues for their programs, including those involving social services in Malaysia. Their study attempted to determine factors contributing to tax evasion and its effects on society. It also examined tax evasion issues in Malaysia between 1963 and 2010. They found a relationship between tax burdens, the size of the government, the inflation rate on tax evasion, the effect of taxpayers' income, and trade openness with tax evasion. While these studies provided some insights on the problem of tax evasion, they do not investigate the criminality or the problem in the U.S. sex market. This study aims to shed light on this criminal practice in the problem in the U.S. sex market.

METHODS

This research study uses a qualitative approach and descriptive statistics to analyze the problem of tax evasion in the U.S. sex market. First, this study collected 100 tax violation and prostitution-related cases reported between 1980 and 2021. (See

Appendix A.) The cases were identified by searching online using Google, Google Scholar, and Pacer. Keywords related to tax fraud and commercial sexual exploitation were used, including tax evasion, tax fraud, prostitution, sex trafficking, room salon, hostess bar, brothel, *doumi*, escort services, strip clubs, and massage parlors. Fifty-three cases were reported between 2011 and 2021, followed by 18 (2001- 2010), 16 (1991- 2000), and 13 (1980-1990).

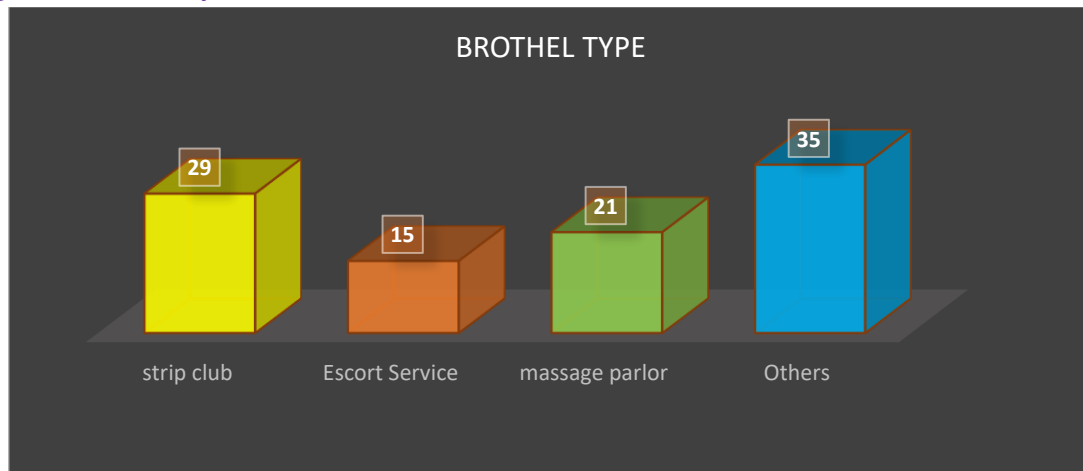
Second, the collected cases were analyzed. This analysis includes state and federal cases of child sex trafficking, adult sex trafficking, prostitution-related Racketeer Influenced and Corruption Organizations (R.I.C.O.) cases, and pornography indicted or prosecuted in the U.S. Cases involving venues for prostitution, such as escort services, strip clubs, and massage parlors are included. Lastly, individuals engaged in the commercial sex market, such as facilitators, and sex buyers of commercial sex, are included in this study. Facilitators are “secondary profiteers” who knowingly and intentionally assist, enable, aid, or financially benefit from participation in a trafficking venture” or commercial sexual exploitation (Shared Hope International, 2021). The sources include state and federal legal cases, newspaper reports, press releases, and court documents. The following documents were collected from the U.S. District Courts and state courts nationwide using Google Scholar, Google, Pacer.gov, and various local and state court websites: indictments; complaints; and plea agreements. Also, this study analyzed press releases from the U.S. federal and state authorities and news reports with police statements and published indictments. When the legal documents are inaccessible to the public, news articles, and press releases were used to provide more descriptive information about the problems surrounding tax violation charges in the U.S. sex market.

This study was conducted by one researcher who extracted and analyzed the collection of cases identified by U.S. federal, state, and local law enforcement. This study is limited to the cases identified by law enforcement in the U.S. Hence, this study does not include the cases identified by scholars or service providers. This study also excludes the cases that were identified by foreign authorities.

FINDINGS

This study includes 100 cases prosecuted in either federal or state courts on tax fraud and prostitution-related charges (See Appendix A). This study found that 29% (29) out of 100 cases involved strip clubs, followed by 21% (21) massage parlors, 15% (15) escort services, 12 (12%) prostitution, 7% (7) sex trafficking, 7% (7) facilitators, 5% (5) pornography, and 4% (4) sex buyers’ cases (See Figure 1).

Figure 1. Cases by Venue



The following findings present the analysis of tax evasion cases involved in the U.S. sex market.

STRIP CLUBS

This study found that 29% (29) out of 100 cases involved tax fraud committed by strip club owners or managers. Strip club cases accounted for the highest number of the commercial sexual venues identified in this study. This study also found that 90% (26) of the 29 cases were prosecuted since 2000, when the Trafficking Victims Protection Act was first enacted in the United States (Victims of Trafficking and Violence Protection Act of 2000, 2000). Twenty-eight percent (8) of the 29 cases were prosecuted between 2001 and 2010, and 55% (16) of the 29 cases were prosecuted between 2011 and 2021. These numbers and percentages suggest that the U.S. anti-trafficking effort may have increased the prosecution of strip club owners and managers on tax evasion-related charges from 2001 to 2021. This study also found multiple tax evasion methods used by strip club owners. Of the 29 cases, 59% (17) involved corporate tax fraud committed by the owners, and 41% (12) involved personal income tax fraud.

The following describes the findings of tax evasion or fraud cases involving strip club owners.

Dancers' Fees

This study suggests that the strip club industry may generate multimillion-dollar revenue from dancers' fees, which are fees that many strip club owners or managers charge dancers for the "privilege to dance" at the strip club venues (McGowan, 2016; Hall, 2020). Several cases revealed that the strip club owners' income amounted to millions of dollars (*U.S. v. Jones*, 2015; Barry, 2009; Pulkkinen, 2009). In some cases, their illicit income was solely based on dancers' fees or tips and excluded their earnings from the beverage and food sales (*U.S. v. Anthony Buttitta and Dominic Buttitta*, 2012; A.D.I. Staff Reporter, 2012; Portland Strip Club Operators Sentenced, 2016). These cases suggest that strip dancing or prostitution, rather than alcohol or food sales, is a substantial profit source of income for the club owners and managers. Of 29 cases, 16 cases involved the specific revenue amount generated by the dancers' fees, prostitution, or both. (See Table 1).

Out of the 16 cases examined, Cynthia Dibernardo's Indictment (*U.S. v. Dibernardo*, 2012) showed the lowest annual income, or \$117,000, generated by the strip club businesses). The highest income was in Frank Colacurcio's Indictment, amounting to approximately \$6 million (*U.S. v. Colacurcio Sr., Colacurcio Jr., Christiansen, Ebert, Fueston, Conte, D.C.E. Inc., MM MR RM Corporation, & L.L.C. Everett I*, 2009; Pulkkinen, 2009). Colacurcio operated four strip clubs in Washington as fronts for prostitution. His strip clubs generated \$25 million in four years (Pulkkinen, 2009; *U.S. v. Colacurcio et al.*, 2009). The defendants charged the dancers "rent" or a fee for each shift that they worked. These fees were \$75 at one venue and \$130 at another venue (*U.S. v. Colacurcio et al.*, 2009). Colacurcio and his co-conspirators earned more than \$6.25 million a year operating a prostitution business out of his four strip clubs. The total revenue generated by the strip clubs in the 16 cases was over \$17 million a year (See Table 1), and the average annual income generated by the strip clubs in the 16 cases was over \$1 million. These figures show that many strip club owners may not report their cash incomes generated by dancers' fees, tips, or prostitution to the U.S. authority.

Table 1. Total Annual Income in Each Strip Club Case

Defendant Name	Minimum Annual Income
Frank Colacurcio, Sr.	\$6000000
Cornell Jones	3462553
Richard Furnelli	1640000
Ahmad Rahiminejad	1100000
PRP Restaurant	879836
Adewale Victor Oshin	600000
Anthony Buttitta	530000
Gary Bryant	506800
Kevin Rankin	467000
John Potter	460000
Emmanouil Varagiannis	450000
Daniel Kiraz et al.	375000
Radomir Buzdum	312500
Kirk Roberts	269000
Michael Moore	263000
Cynthia Dibernardo	117000
Grand Total	17432689
Minimum	117000
Maximum	6250000
Average Income/case	1035512

Filing a False Tax Return

In more than half of the 29 strip club cases, or 55% (16), the owners committed tax fraud. The U.S. law defines tax fraud as intentional wrongdoing on the part of a taxpayer with the specific purpose of evading a tax known or believed to be owed to the Internal Revenue Service (Internal Revenue Manual, n.d.). Out of the 16 cases, 31% (5) were prosecuted for “filing a false tax return,” an act of misreporting one’s income to the I.R.S. (Brown, PC, 2022). For instance, in 2012, Cynthia Dibernardo (*U.S. v. Dibernardo*, 2012) was prosecuted for filing a false tax return after using two separate ledgers to hide her cash collected through tips, house fees from dancers, and payments from customers for private entertainment in a V.I.P. area. A V.I.P. area is a private room available to a sex buyer for an additional fee or the purchase of a bottle of alcohol at an inflated price. The little room ensures privacy for sex acts (Taylor, 2020). In 2013, Kirk Roberts was prosecuted after failing to report over \$530,000 in cash receipts from his strip club (Associated Press, 2013). Roberts concealed the cash by depositing it in his personal account rather than the corporate account. In 2016, the Department of Justice press release stated that David Kiraz and his co-conspirators collected at least \$1.5. million in dancer stage fees and cover charges between 2007 and mid-2011. Kiraz and his co-conspirators also kept two sets of ledgers. They gave one to their tax preparers and kept another one at one of the co-conspirators’ residences (Portland Strip Club Operators, 2016). These cases show that many strip club owners use cash-intensive transactions to avoid their tax liabilities.

Failure to File a Tax Return

This study found that 62% (18) out of the 29 cases involved tax evasion by the owners or managers of the strip clubs. In this study, 28% (5) of the 18 cases, or the highest percent of the tax evasion cases, were prosecuted in “attempt to evade or defeat tax charge” (Barry, 2015; Former firefighter, *U.S. v. Kendrick*, 2009). In 2015, Richard Furnelli was sentenced to eight months in jail for failing to file a tax return (Barry, 2015). His financial records showed that he owed \$2 million in state and federal back taxes while collecting \$100,000 per month from his strip club business (Barry, 2015). He also used several custodians for their accounts to conceal his total income to avoid income tax liabilities (Barry, 2015).¹ In 2009, Matthew J. Fox was arrested after failing to report more than \$400,000 in cash earnings for working at a strip club (Former firefighter, strip club, 2009). While working at a strip club, Fox received hourly wages and cash tips from the dancers as a bouncer. However, he failed to report his earnings at the club (Former firefighter, strip club, 2009). In 2003, Jacqueline Kendrick was sentenced to prison after pleading guilty to income tax evasion (*U.S. v. Kendrick*, 2009). As an owner of a strip club, Kendrick used her earnings at the club to purchase luxury automobiles and resident properties to hide her income and avoid her tax liabilities (Staff Report, 2003). These cases suggest that many criminals engaging in tax evasion rely on various means to hide their overall illicit proceeds.

MASSAGE PARLORS

This study found that 21% (21) of the 100 massage parlor cases found tax evasion by the owners. Unlike other brothel cases, people involved in massage parlors were from various ethnic backgrounds. They included: U.S. citizens; Chinese; and Koreans.

¹ In banking, nominees are custodians who safeguard the assets for the original account holders in an event when the original account holders are absent. Nominees can be individuals or entities.

Also, the massage parlor owners utilized diverse methods to commit tax evasion. Out of 21 cases, 38% (8) of them involved U.S. citizens, 38% (8) were Chinese, and 19% (5) were Koreans. However, only 17 (81%) of 21 cases revealed specific tax evasion methods used by the criminals. Out of the 17 cases, 53% (9) mentioned tax evasion, followed by 24% (4) sales tax fraud, and 24% (3) employment tax fraud. The following describes the findings on the tax evasion committed by massage parlor owners.

Sales Tax Evasion-Chinese Parlors

Sales tax fraud occurs when businesses fail to collect sales taxes from their customers and report to the authorities (Galstian, n.d.). This study found that three (75%) out of the four tax evasion cases involved Chinese massage parlor owners (Wentland, 2021; Warfield, 2019; New Staff, 2021). In 2021, local media in Detroit Lakes, Minnesota, reported the police arrest of Jin lan Li and her husband for multiple charges, including a failure to pay or collect sales taxes (New Staff, 2021). Li and her husband were arrested after the police received multiple reports on prostitution-related activities at their massage parlor. The couple also failed to file sales tax for several years for their parlor business which was registered as a partnership as required by the state authority (Minnesota Department of Revenue, 2021). In another news report in 2021, Yuping Wang was arrested for multiple charges after operating a massage parlor for several years (Wentland, 2021). The investigators discovered that Yang underreported the sales amount for business tax of her filing in 2019. Wang fraudulently reported that 94% of the business's sales in part of 2019 were credit card sales, and the remaining 6% were cash. However, the investigator discovered the video evidence showed that 82% of sales were in cash while 18% of sales were in credit cards (Wentland, 2021). These cases show that business sale tax evasion may be more pervasive among Chinese parlor owners than others operating in the U.S. sex market.

Employment Tax fraud- Korean Parlors

Employment tax fraud occurs when an employer fails to collect and withhold payroll taxes, including federal unemployment, social security, and withholding taxes, and pay to the Internal Revenue Services (Fedor, n.d.). Two (67%) out of the three involving fraudulent employment tax schemes were those of South Korean owners (*U.S. v. Robinson*, 1992; *Peacock v. Commissioner*, 1997). In 1992, a legal brief states that Sue Robinson gave false 1099 forms, a tax return form for an independent contractor, to two of her employees. The employees then used those forms to file false tax returns. Robinson also could avoid paying for employee benefits or other costs attached to hiring W-2 employees (*U.S. v. Robinson*, 1992; Mondry, 2020). In *Peacock v. Commissioner* (1992), a couple operated several massage parlors selling Korean women for prostitution. James and Chung Peacock gave false W-2 forms showing that each masseuse earned substantially less than their actual earnings. The court document stated that their businesses heavily relied on cash transactions (*Peacock v. Commissioner*, 1997). These cases suggest that some South Korean parlors may be more likely to engage in employment tax fraud than others in the U.S. sex market.

ESCORT SERVICES

This study found 16 tax evasion-related cases involving escort agencies. Out of the 16 cases, 31% (5) of them were prosecuted between 2011 and 2021, 19% (3) between 2001 and 2010, 19% (3) cases between 1991 and 2000, and 31% (5) cases between 1980 and 1990. Unlike massage parlor cases, 88% (14) the cases involved

personal income tax fraud and 13% (2) cases involved business tax fraud. Case analysis revealed that escort agency owners have more frequently underreported than unreported personal income to avoid their tax liabilities (See Appendix A; Table 2). For instance, 71% (10) of the 14 cases showed underreporting on their income tax returns. The criminals also relied on various methods to underreport their income tax. 21% (2) of the 10 cases show that the escort agency owners relied on their family members, 36% (3) purchasing assets, and 29% (3) used shell corporations to underreport their annual income. The following describes the various tax evasion methods used by escort agency owners operating in the sex market.

Family Members

This study found that using family members to hide the income is the least frequently used by the escort agency owners to underreport their annual income to the U.S. authority. In this study, of the 10 escort agency cases, 20% (2) of the cases mentioned that the criminals relied on family members to underreport their income tax. In 2017, the Indictment stated that Dennis Zarudny allegedly committed tax evasion after underreporting his earnings from his escort agency operation (Neal, 2017). Zarudny underreported his personal income, his spouse's personal income, and the gross income of his company to conceal his earnings from his prostitution business (Neal, 2017). In 2012, Jody Hoskin was convicted for underreporting her earnings from the prostitution business (*U.S. v. Hoskins & Hoskins*, 2008). According to the court document, Hoskin filed a joint income tax return with her husband and she intentionally underreported the gross income of her escort agency by \$1.2 million (*U.S. v. Hoskins et al.*, 2008). In 1994, Heidi Fleiss was indicted for underreporting her earnings from the escort business (Heidi Fleiss indicted on, 1994). Fleiss underreported her income by sending cash payments for prostitution to her father's and sister's accounts (Heidi Fleiss indicted, 1994). She only reported \$33000 as her sole annual income to the U.S. authority (Heidi Fleiss indicted on, 1994). These examples show that multiple escort agency owners use family members to underreport their income.

Table 2. Income Tax Underreporting by Escort Services

		Under-reporting	Shell Corporation	Family Members	Asset Acquisition
Ralph Washington	1986	x			x
Alvin Sigalow	1986	x			
Heidi Fleiss	1994	x		x	
Mara Beth Montag	1994	x	x		
Brenda Zapatka	1994	x			
Brenda Stewart	2010	x			
U.S. v. Tilga	2011	x	x		x
Jody Hoskins	2012	x		x	
Dennis Zarudny	2017	x	x		
Melanie Smith	2012	x			x

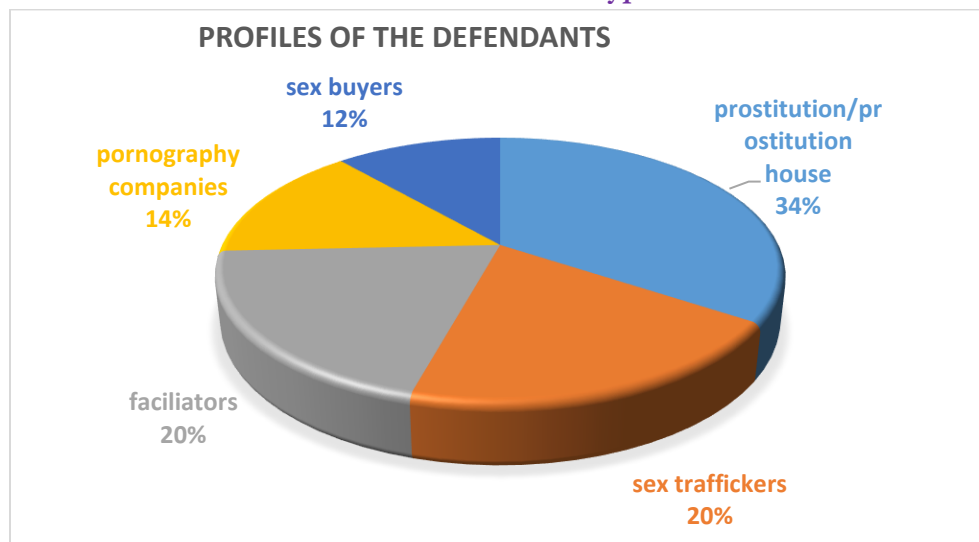
Asset Acquisition

This study also found that in 30% (3) of the 10 cases, the owners acquired assets to avoid tax liabilities. In 2012, for instance, a court document revealed that Melanie Smith purchased jewelry, paintings, and properties with prostitution funds to hide part of her income (*People v. Smith*, 2012). She did not report cash earnings from the prostitution business for one year (*People v. Smith*, 2012). In *U.S. v. Tilga & Chandler* (2011), the defendant purchased real estate using an offshore account in partnership with a Canadian corporation, C.T.C. Trust. C.T.C. trust then wired \$8.7 million into the U.S. from Tilga's offshore account, and he used the funds to purchase properties in several states (*U.S. v. Tilga & Chandler*, 2011). In 1986, the case brief showed that Ralph Washington acquired \$1 million in assets with his earnings from the escort business. These assets included retail businesses, rental property, a Rolls Royce, and a \$350,000 residence (*U.S. v. Washington*, 1986). An asset purchase is a frequently used money laundering method by various brothel owners in the U.S. (Dale, 2019, p.10- p.11). Therefore, these examples show that some criminals' tax evasion techniques are similar to their money laundering methods.

OTHER TYPES OF TAX EVASION AND FRAUD CASES

This study found that 35 cases of individuals were prosecuted for tax evasion-related crimes. Out of 35 cases, 34% (12) involved prostitution house operators or women or men in prostitution, 20% (7) sex traffickers, 20% (7) facilitators, 14% (5) pornography companies, and 11% (4) sex buyers. The following describes the cases involving individuals prosecuted for tax evasion-related crimes in the U.S. sex market.

Figure 2. Profiles of the Defendants in Other Types of Cases



PROSTITUTION

This study found 12 cases of prostitution and tax fraud-related cases. Out of the 12 cases, 53% (7) involved an individual woman or man selling commercial sex; and 42% (5) involved a house of prostitution or a residential brothel. Whereas some media reports recently have raised a concern that enforcement of tax violation is

harming those engaged in commercial sex on their own volition, the finding in this study suggests that tax fraud laws have been much more frequently used to prosecute brothel owners or managers rather than the individuals engaged in commercial sex since the 1980s (Bhattacharjee, 2018; Quinlannov, 2018). Also, the findings of this research suggest that the change of technology has affected the illicit business practices among the criminals operating in the commercial sex market. The following describes the cases of tax evasion or fraud and prostitution-related crime.

Tax Violations Prosecutions of Brothel Owners

Recently, some news media have reported that law enforcement uses tax evasion charges to harm those voluntarily engaged in prostitution (Bhattacharjee, 2018; Quinlannov, 2018). After a public social media campaign to crack down on tax evasion committed by the individuals engaging in prostitution occurred. In response to the campaign, some advocated that decriminalization of prostitution was necessary to protect the women in prostitution (Quinlannov, 2018).

However, this study found that tax evasion or fraud charges have been used to dismantle brothel or sex trafficking operations rather than target women who voluntarily engage in commercial sex. Only 7% (7) out of 100 tax fraud-related cases involved the prosecution of women or men selling commercial sex; 93% (93) of the total cases found were the prosecution of brothel owners, sex traffickers, sex buyers, and other criminals profiting from commercial sexual exploitation. Whereas the media reports were written in 2018, this study found only one tax evasion case charging an individual selling sex on her own between 2018 and 2021 (South Florida Escort Sentenced, 2021). Instead, this study found multiple cases prosecuting brothel owners, sex buyers, and their facilitators profiting from the commercial sexual exploitation of women, men, and children in the U.S. sex market. Hence, tax fraud laws have been more frequently used to tackle brothel owners or traffickers instead of those voluntarily engaged in prostitution.

Houses of Prostitution

Cases of the house of prostitution show that internet development may have affected brothel operation tactics in the U.S. For instance, this study found that 42% (5) of 12 cases involved prosecuting those operating a house of prostitution. Ironically, all five cases were prosecuted before 2000, when the Internet became available to the general public (Spiegel, 1999). This study found no cases of houses of prostitution prosecuted since the year 2000. In 1997, George and Connie Blair were indicted after running several prostitution houses. The couple also sold drugs to the sex buyers and the women who were prostituted in their brothels. Although they owned several businesses and properties, George Blair has never filed income tax returns between 1990 and 1995; and Connie Blair had underreported her income with a different name. In *Toms v. Commissioner* (1992), Francis Toms was indicted after operating a house of prostitution for several years. She also was charged with tax evasion. Toms was responsible for decisions on advertising on several newspapers, handling the money, and keeping of ledgers. She employed five women and three male escorts who performed prostitution at her house. However, she failed to file Forms 1099 or W-2 with the Internal Revenue Service for compensation paid to her employees for several years. She also did not maintain a business account (*Toms v. Commissioner*, 1992). Whereas the brothel models have changed over the years, these cases show that some tax evasion practices may have remained the same in the U.S. sex market (Associated Press, 2017; Michigan Restaurant and Strip, 2021). Hence, changes in society and

policies may affect the business practices used by the criminals operating in the U.S. sex market.

SEX TRAFFICKING

This study found seven (7%) cases of sex trafficking-related cases. Some cases mentioned prostitution-related charges of a minor victim, and others mentioned the term “pimp.” Out of the seven cases, 71% (5) cases involved the prosecution of pimps or traffickers. However, only 40% (2) of the cases showed that the sex traffickers were also prosecuted for tax evasion. Also, 60% (3) of the cases showed that either the victim or the victim’s family was prosecuted for tax evasion or threatened to report the crime. The following describes sex trafficking and tax evasion-related cases found in the U.S.

Tax Violation Charges for Traffickers

The findings suggest that law enforcement officials prosecuting sex traffickers may underutilize tax evasion-related charges. In this study, 72% (5) of the cases involved either a sex trafficker or a pimp; and only 40% (2) of the cases mentioned prosecution of sex traffickers for tax evasion. For instance, in *U.S. v. Taylor* (2000), the district attorney presented evidence of Taylor’s failure to file his income tax return and his trips to further his prostitution business as his “bad acts” to show the illicit source of his income to prove his money laundering activities *U.S. v. Taylor*, 2000). However, Taylor was never charged with tax evasion or fraud on his illicit income from sex trafficking operations. In *U.S. v. Ray* (2020), Lawrence Ray was indicted for trafficking college students for sex after moving into his daughter’s college campus housing (*U.S. v. Ray*, 2020). To conceal his illicit profit, Ray used shell bank accounts under nominal names to deposit cash into those accounts. Although the evidence for similar tactics was used to prosecute another trafficker for tax evasion, Ray was never prosecuted for the same crime (U.S. Press Release, 2020; *U.S. v. Ray*, 2020). These raise concerns that some traffickers may not face penalties after convictions for the crime.

Tax Violation Charges Criminalizing Victims

This study finding also raises concerns over whether tax violation charges have been used to target sex trafficking victims rather than their perpetrators. For instance, in 2007 Nancy Adams was convicted of tax evasion after allegedly operating a prostitution enterprise with her pimp, Louise Young (Press Release, 2007). In 2020, the appellate court brief alleges that Timothy Houser was convicted of patronizing a prostituted child. The 16-year-old victim testified at Houser’s trial that Houser responded to her advertisement for commercial sex on Craigslist (*People v. Houser*, 2020). The minor victim’s mother received a threatening call from Houser’s attorney and his investigator during the investigation. They said that if the victim testified, they would charge the victim and her mother with federal tax evasion (*People v. Houser*, 2020). In 2006, a survivor was indicted for conspiracy to commit tax evasion because of her sex trafficking exploitation. The Indictment alleged that she used false identification to structure her earnings from commercial sexual services. She was later convicted of conspiracy to commit tax evasion and served 13 months in federal prison (Fink, 2020). The U.S. President later pardoned the survivor in 2020 (Fink, 2020). During the interview, she said that she took the tax evasion charge out of fear of death and violence from her pimp (Fink, 2020). These cases raise concerns over whether tax evasion charges were inappropriately used to target sex trafficking victims.

FACILITATORS

Facilitators refer to the persons who knowingly or intentionally assist, enable, aid, or financially benefit from participation in a trafficking venture or commercial sexual exploitation of another person (Sex trafficking of children or by force, fraud, or coercion, 2018; Shared Hope International, 2021; Interstate and Foreign Travel or Transportation in Aid of Racketeering Enterprises, 2013). Examples of facilitators include investors, money launderers, travel agencies, advertisers, managers, hotels, or motels that profited from the commercial sexual exploitation of other individuals (*U.S. v. Kim, Han, Yi, Lowry, Wang & Lu*, 2018; *U.S. v. Kim, Ham, Kim, Joo, Kim, Yun, Lee, Shin, Li, Jung & Peterson*, 2016; *U.S. v. Kimmel*, 2005; *U.S. v. Kim, Il, Lee, Choi, Bae, Polachek, Son, Son, Lee & Park*, 2006). The U.S. federal law prohibits anyone from facilitating the prostitution of another person using a facility, interstate commerce, or foreign commerce (Promotion or Facilitation of Prostitution and Reckless Disregard of Sex Trafficking, 2020). The law also penalizes a violator with fines and a prison sentence of no more than 10 years (Promotion or Facilitation of Prostitution and Reckless Disregard of Sex Trafficking, 2020). In this study, only 7% (7) of cases involved the prosecution of facilitators. These cases included two advertisers, one member of a criminal organization, two loan sharks, one corrupt law enforcement officer, one lawyer, and one accountant. Also, 71% (5) of cases mentioned organized criminal activities. The following shows tax evasion or fraud methods used by facilitators operating in the U.S. sex market.

Organized Crime

This study found that 71% (5) of cases involved organized crime members or those closely working with organized crime groups. In 2005, Salvatore Scala was indicted after extorting several strip clubs in New York (*U.S. v. Scala et al.*, 2005). Scala, as a member of a criminal organization, extorted money and properties from several owners or managers of the adult entertainment clubs based in New York City. He collected large sums of cash from the owners of the adult entertainment industry and deposited part of them to the two bank accounts that he controlled. Then, he failed to file an income tax return for several years to avoid tax liabilities (*U.S. v. Scala et al.*, 2005). In 1995, Carl Nanni (*U.S. v. Nanni*, 1995) was prosecuted for providing accounting services to various organized criminal groups and an individual operating a prostitution business. When he learned that he was under investigation, Nanni hired a hitman to murder material witnesses willing to testify against him if they appeared in court. In 2012, several individuals were indicted for operating an advertisement company named Somad Enterprise, in New York. Somad Enterprise members earned over three million dollars in less than two years for providing advertising services to multiple Asian brothels operating in various states (A.G. Schneiderman Announces 20, 2012). Recent cases mention the violence of organized crime members exploiting sex trafficking victims (*U.S. v. Kim et al.*, 2018; A.G. Schneiderman Announces 20, 2012). These examples show that organized crime groups often profit from facilitating brothel operations in the U.S.

Professionals as Facilitators

Some cases described techniques used by legal professionals or accountants using more complex tax fraud methods to maximize their illicit gains. For instance, in *U.S. v. Nanni* (1995), Carl Nanni was a former accountant whose license was revoked after pleading guilty to embezzlement. However, Nanni continued to operate his accounting business serving organized crime groups and the adult entertainment industry. After his license was revoked, he continued to operate an accounting business

and prepared false tax returns for his clients under his daughter's names and those of other fictitious corporations (*U.S. v. Nanni*, 1995). In *U.S. v. Bergrin* (2011), Paul Bergrin falsely stated that his client, J.I., was employed by his law office so that J.I. could operate his prostitution business in violation of his state parole restriction. As a result, J.I. was subsequently arrested in another state. While J.I. was imprisoned, Bergrin managed his prostitution business. Bergrin also opened a real estate investment business as an S-corporation to support his prostitution business (*U.S. v. Bergrin*, 2011).² An S-corporation allows the owner to claim a share of the company's profit on his or her personal tax return: it allows the owner to avoid paying corporate taxes (Legal Zoom Staff, 2021). The investigators found that he falsely stated nondeductible personal expenses as deductible to underreport his income. He also falsely claimed short-term capital loss to reduce his tax liability. Lastly, Bergrin falsely stated his personal income to avoid further tax liability. These examples show that some facilitators use more sophisticated criminal methods to avoid their tax liabilities.

PORNOGRAPHY

In this study, 5% (5) of the 100 sample cases involved pornography businesses. Of the five cases, 60% (3) were prosecuted between 2001 and 2010; and 40% (2) were prosecuted between 1991 and 2000. No cases were found between 2010 and 2021 and 1980 and 1990. The following describes the findings of tax evasion cases involving pornography businesses.

Multimillion-dollar Industry

In this study, all cases involving pornography had multimillion-dollar incomes. (See Table 3). In two cases, court documents reported that fines were imposed on pornography companies as a result of tax evasion or fraud conviction. Also, three cases indicated the number of illicit assets seized or uncovered during the investigation. For instance, in 2009, Francis Sharrak was ordered to pay \$4.2 million in restitution after failing to report the multimillion worth of taxable income (*U.S. v. Sharrak*, 2009; Authorities: man sentenced to, 2012). In 2004, the Department of Justice announced that John Coil was ordered to forfeit over \$8.1 million worth of properties purchased with his earnings from the pornography businesses (John Kenneth Coil Sentenced, 2004). In *U.S. v. Sturman et al.* (1991), Reuben Sturman was ordered to pay \$2.5 million in fines after the court found him guilty of tax evasion and other criminal charges relating to his pornography businesses (*U.S. v. Sturman et al.*, 1991). Multiple sources showed that the pornography industry has frequently profited from sex trafficking and child pornography (Twenty-year Sentence in, 2021; Zimney, 2021; U.S. Attorney's Office, 2021; Mohan, 2021; Pornhub Sued by 40, 2020). However, these cases suggest that pornography business owners may profit multiple million dollars at the expense of many victims' commercial sexual exploitation.

² Internal Revenue Service defines that the S-Corporation as "a corporation that elect to pass corporate income, losses, deductions, and credits through to their shareholders for federal tax purposes. Shareholders of S corporations report the flow-through of income and losses on their personal tax returns and are assessed tax at their individual income tax rate. This allows S corporations to avoid double taxation on the corporate income" (S corporations, n.d.).

Table 3. Illicit Assets or Fines in Pornography Cases

Case Name	Year	Illicit Assets Uncovered or Forfeited	Fines
<i>U.S. v. Sturman et al.</i>	1991	Unknown	\$2.5 Million
<i>Alexander v. U.S.</i>	1993	Unknown	\$100,000
<i>U.S. v. Coil et al.</i>	2003	\$8.1 million	Unknown
<i>U.S. v. Francis</i>	2007	\$9 million	Unknown
<i>U.S. v. Sharrak</i>	2009	\$4.2 million	Unknown
Average Value of Illicit Assets and Fines		\$7.1 million	\$1.3 million

Fictitious Names

This study found that pornography companies often use fictitious names and shell businesses to avoid tax liabilities (See Table 4). Of the five cases, 100% had nominal entities, shell businesses, or both for tax evasion. Sixty percent (3) of the five cases showed that the criminals used nominal names to commit tax evasion. In 2004, John Coil (*U.S. v. Coil, Phelps, Coil & Coil*, 2003) was sentenced to 63 months in federal prison for tax evasion and other related federal charges (Press Release, 2004). John Coil opened shell businesses with fictitious entities in multiple states, including Texas and New Mexico (Press Release, 2004). He used his children's names without their knowledge to conceal his income and purchase several investment properties to avoid his income tax liabilities (*U.S. v. Coil et al.*, 2003; Press Release, 2004). In 2009, Francis Sharrak (*U.S. v. Sharrak*, 2009) was indicted after failing to report his earnings from his online pornography business. The Indictment stated that he earned over \$3.7 million between 1997 and 2001. Sharrak also purchased investment properties under nominal names to avoid tax liabilities (*U.S. v. Sharrak*, 2009). After finding him guilty, the court ordered him to pay \$4.2 million in restitution (Authorities: Jailed Man Announced, 2012). These cases show that many pornography business owners may use various individual identifications to avoid their tax liabilities.

Table 4: Tax Evasion Methods Used in Pornography Cases

Case Name	Year	Shell Corporation	Fictitious or Nominal Names
<i>U.S. v. Sturman et al.</i>	1991	x	
<i>Alexander v. U.S.</i>	1993		
<i>U.S. v. Coil et al.</i>	2003	x	x
<i>U.S. v. Francis</i>	2007	x	
<i>U.S. v. Sharrak</i>	2009		x

Shell Corporations

This study also found that 60% (3) of the five cases mentioned that the owners used shell corporations to conceal their taxable income. The shell businesses in these cases included an insurance company, a nonprofit organization, investment

companies, and trustee accounts (*U.S. v. Francis*, 2007; *U.S. v. Coil et al.*, 2003; *U.S. v. Sturman et al.*, 1991). In 2007, Joseph Francis (*U.S. v. Francis*, 2007) opened several shell businesses, including an insurance company in Asia, to commit tax evasion. Francis registered his pornography business, Girls Gone Wild, as an S-Corp. While an S-Corporation is not required to pay a corporate income tax, the income tax liability is transferred to its shareholder. As a sole shareholder of Girls Gone Wild, Francis set up multiple other businesses and investment accounts, including an insurance company in Asia and another corporation in Mexico (*U.S. v. Francis*, 2007). The investigators found overstated deductions for construction and professional services in Mexico, false consulting services, and insurance expenses. Francis also opened an investment brokerage account in California using multiple limited liability companies under his control to hide his taxable income. He underreported approximately \$9 million for tax evasion (*U.S. v. Francis*, 2007). In *U.S. v. Sturman et al.* (1991), Reuben Sturman and his associates operated an adult entertainment business producing and distributing pornography (*U.S. v. Sturman et al.*, 1991). Reuben Sturman opened at least 160 shell corporations with fictitious shareholders and owner names to conceal his profit from his pornography business. These cases show that shell businesses have often been used for tax evasion in the pornography industry.

SEX BUYERS

This study found that only 4% (4) of the 100 cases involved sex buyers prosecuted for tax evasion between 2018 and 2021, and three (75%) of them were prosecuted between 2020 and 2021. Also, no sex buyer cases were found between 1980 and 2017. All four sex buyer cases showed that their purchase of commercial sex services was not the primary reason behind their prosecution. Instead, their brothel visits or commercial sex purchases were uncovered during the broader investigation of their tax evasion activities. These suggest that demand reduction for commercial sex may not be a priority for law enforcement. The following describes the finding of the cases involving tax evasion by sex buyers.

Business Expenses

Case examples show that some sex buyers frequently report their brothel visits as part of their business expenses. In *U.S. v. Fruits* (2020), Daniel Fruits was indicted after defrauding his investors of 14 million-dollars. The authority found that Daniel spent \$30,000 of the investment fund on two escort services. He falsely recorded the commercial sex purchase as a corporate expense (*U.S. v. Fruits*, 2020). In 2021, Rafael Salas Jr. was sentenced to a year-and-a-half in prison after failing to pay the government the taxes he withheld from his employees' paychecks (Columbia man sentenced to, 2021; *U.S. v. Salas*, 2019). He pled guilty to failing to pay the government taxes after withholding his employees' paychecks (Columbia Man Sentenced, 2021). Instead, he used the money to pay for approximately \$10,000 worth of local strip club visits and other personal expenses (Columbia man sentenced to, 2021). Salas was sentenced to one year and a half in prison for his crime (Columbia man sentenced to, 2021). In 2020, Charles Resnick, a former economist employed by a government-funded nonprofit, was indicted for tax evasion (Kelly, 2020). The investigators found that he visited brothels using government funds during the business trip. Resnick also reported the purchase of escort services as part of the business travel costs (Kelly, 2020). Resnick was sentenced to five years in home detention (*U.S. v. Resnick*, 2020). These cases suggest that harsher penalties may be necessary to reduce demand for commercial sex reported as business expenses.

DISCUSSION

Many criminals in the commercial sex market use various methods to evade tax liabilities and maximize their illicit profit from exploiting their victims. While victims and survivors often have little to no resources to rehabilitate their lives, the criminals and their facilitators earn multimillion-dollar profits from exploiting their victims through commercial sex (Williamson, Dutch & Clawson, 2010). What is more, case analysis suggests that while much of the prosecutorial efforts have been reactive to the anti-trafficking efforts, it is vital to urge the law enforcement to fight the problem more proactively and holistically (Bouche & Crotty, 2017; Dale & Levesque, 2017; Human Trafficking in Illicit Massage Business, 2018). The following section discusses the importance of combating tax evasion and fraud in the commercial sex market, the current obstacles, and recommendations.

Doumi Services, Cantinas, and Residential Brothels

Several cases show that law enforcement may not be investigating many other types of brothels that rarely receive attention from many anti-trafficking groups. For instance, whereas this study found multiple tax evasion or fraud cases involving strip clubs, massage parlors, and escort services, there were no cases found involving *doumi* service agencies, karaoke bars, Cantinas, or residential brothels were found. *Doumi* means “helper” in the Korean language. In the context of prostitution, it means a Korean call girl service that supplies women to different prostitution venues, such as Karaoke. Evidence suggests that tax fraud is frequently occurring in these brothels. For instance, in *U.S. v. Won* (2010), Taesan Won was indicted for operating a *doumi* service exploiting Korean women in Northern Virginia. He supplied women to local Korean karaoke bars for entertaining male patrons. The Indictment shows that *doumi* service agencies engage in cash-intensive transactions to evade tax liabilities (*U.S. v. Won*, 2010; Sunday Staff, 2020). In 2015 (*U.S. v. Medeles-Arguello*, 2017), Hortencia Medeles-Arguello, or Tencha, was found guilty of sex trafficking conspiracy after running a brothel out of her Cantina bar (Federal jury convicts sex, 2015). Investigators found that Tencha’s Cantina bar generated more than \$1.6 million for brothel operation (*U.S. v. Medeles-Arguello*, 2017). She also received \$20,000 a week from three traffickers with whom she agreed to manage the brothel operation. Within two months, she purchased 29 cashier’s checks amounting to \$259,689. Tencha’s case found evidence for her potential tax evasion activities. However, she was never investigated nor charged with the crime. These cases suggest that it is important to urge law enforcement to investigate all types of brothels profiting from the commercial sexual exploitation of women, men, and children.

Criminals Behind Massage Parlors

Case analysis shows that many facilitators may remain under the radar even after the law enforcement prosecution of the parlor owners. In 2016, for instance, police arrested Yie Sun Kim Tolley for prostituting Asian women at a local massage parlor (*State v. Tolley*, 2016; Gremillion, 2016). The business record shows that Yie Sun Kim opened the spa with another person (Gremillion, 2016). However, her partner was never arrested nor mentioned in the court documents (Gremillion, 2016). Ironically, the same individual’s name was mentioned as the president of another spa in a different state (Department of State, 2021; Tokyo Spa, Inc., n.d.). Also, the same business record stated that the owner’s address was a Post Office Box located in the other state (Department of State, 2021). In another case in 2021, several individuals were charged with prostitution-related crimes at local massage parlors in Virginia

(Gangloff, 2021). The business record showed that one woman is associated with two massage parlors in Virginia and Montana. The parlor's business record in Montana listed an additional agent whose name was associated with 29 active corporations and three inactive corporations operating in the state (Registered Agent Search, 2021). Evidence shows that some illicit massage parlor owners are repeat offenders with criminal backgrounds from different jurisdictions (Billing Massage Parlor Owner, 2021). Also, many facilitators, including investors or loan sharks, profit more than the parlor operators from the commercial sex market by supporting multiple brothel operations (Jang *et al.*, 2009, p.82; *U.S. v. Kim et al.*, 2018; *U.S. v. Kim*, 2016; Park, 2019). However, this study found no cases of facilitators profiting from the illicit massage parlor industry. These suggest that many facilitators profiting in the illicit parlor industry remain under law enforcement's radar even when law enforcement shuts down the parlors. Therefore, it is important for law enforcement to proactively prosecute all criminals profiting from the commercial sexual exploitation of men, women, and children to combat trafficking and maximize resources for the victims more effectively.

ILLICIT ASSETS USED FOR ANTI-TRAFFICKING EFFORTS

The U.S. government should be urged to use the forfeited assets and fines from the tax evasion or fraud conviction as resources for anti-trafficking work. Criminals' assets and fines should be used for victims' restitution. For instance, in 2020 alone, the U.S. Justice Department spent \$101 million on anti-trafficking programs in the U.S. (Justice Department Awards, 2020). Although victims often need resources to rehabilitate their lives, only 47% of the sex trafficking cases indicated mandatory restitution for the victims (Williamson, Dutch & Clawson, 2010; Feehs & Wheeler, 2021, p.5). While the funding for trafficking victims is limited, this study shows that the U.S. authorities can increase the resources by increasing its asset seizure amount through better enforcement of tax fraud laws. For instance, in pornography cases alone, this study found that the average amount of asset forfeiture or fines amounted to approximately \$3.08 million per case. Although some criminals filed for bankruptcy, stringent enforcement to trace illicit funds generated by the criminals in the sex market is vital to increase resources for trafficking victims' needs.

CONCLUSION

The U.S. commercial sex market consists of many criminal entities committing tax violations to maximize their earnings from prostitution. This study found strip clubs, massage parlors, escort services, sex buyers, facilitators of brothels, sex traffickers, sex trafficking victims, prostitution house operators, individuals engaging in prostitution, and pornography companies that were prosecuted for tax evasion in the sex market. The case analysis shows that the criminals used various methods to conceal their income to avoid their tax liabilities and maximize their prostitution earnings. While the solution to combat tax evasion may differ depending on the perpetrator's tactics, the study's finding demonstrates that many criminals commit tax fraud to conceal their prostitution earnings amounting to millions of dollars. However, many sex trafficking victims are often left with no resources to rehabilitate their lives. Hence, when the U.S. authority receives forfeited assets or fines from the criminals convicted of tax evasion, it is recommended that the U.S. authority uses them to increase resources for resources to victims in the U.S.

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APPENDIX A

Name	Year	Business Type	Business Tax Fraud	Employment Tax	Income Tax
Adewale Victor Oshin	2012	Strip Club			x
Ahmad Rahiminejad	2012	Strip Club			x
Anthony Buttitta	2012	Strip Club			x
Anthony Cardinalle	1995	Strip Club	x		
Cornell Jones	2015	Strip Club	x		x
Cynthia Dibernardo	2012	Strip Club			x
Daniel Kiraz <i>et al.</i>	2016	Strip Club			x
Emmanouil Varagian-nis	2012	Strip Club	x		
Frank Colacurcio, Sr	2009	Strip Club	x		
Gary Bryant	2017	Strip Club			x
Jacqueline Jeudy Kendrick	2003	Strip Club			x
john Potter	2014	Strip Club	x		
Johni Semma	2021	Strip Club		x	x
Joseph Abodeely	1986	Strip Club	x		
Joseph Marren	1989	Strip Club			x
Keith Forney & Cornell Jones	2010	Strip Club	x		x
Kevin Rankin	2021	Strip Club	x	x	
kirk Roberts	2013	Strip Club	x		x
Matthew Fox	2003	Strip Club	x		x
Michael G. Wellek	2010	Strip Club	x		x
PRP restaurant	2000	Strip Club	x		
Radomir Buzdum	2021	Strip Club	x		
Riccardo DiGiuseppe	2017	Strip Club			x
Richard Furnelli	2010	Strip Club	x		x
Rick Rizzolo	2017	Strip Club		x	
Selim Zherka	2014	Strip Club	x		
Samuel Moore	2010	Strip Club	x		
Salvadore Scala	2005	Strip Club			x
Vincent Mavilia	2009	Strip Club			x
Pasquale John Antonello (Campise v. Commissioner)	1980	Massage Parlor		x	
James Brown	1988	Massage Parlor			x
Richard Toner	1990	Massage Parlor		x	

Susan Robinson	1992	Massage Parlor		x	
Theodore Irving, II (Ac- ton v. Jackson County)	1993	Massage Parlor			x
Ricky and Ritta Hen- derson (Hendersons v. U.S.)	1996	Massage Parlor			x
Jean Kaufman	2012	Massage Parlor	x		x
Brian Scott Jones	2019	Massage Parlor			
Stephen Alexander Hagerman	2020	Massage Parlor			
Matthew Scott Shykes	2020	Massage Parlor			x
Rong Liu	2014	Massage Parlor			x
Chin Pang Liu	2019	Massage Parlor			x
Kao et al	2020	Massage Parlor			x
Yuping Wang	2021	Massage Parlor	x		
JinLan Li	2021	Massage Parlor	x		x
James and Chung Pea- cocks (Peacock v. com- missiononer)	1997	Massage Parlor		x	
Kyong Hurlburt	2015	Massage Parlor			
Jung Yoon Choi	2015	Massage Parlor			x
Yie Sun Kim Tolley	2016	Massage Parlor			x
Li-Lan Chu	2016	Massage Parlor			
Hailin He	2019	Massage Parlor			
Robert Clinkscale	1984	Escort Service			x
Henry James Wright	1986	Escort Service			x
Ralph Washington	1986	Escort Service			x
Alvin Sigalow	1986	Escort Service			x
Crystal Mason	1990	Escort Service			x
Heidi Fleiss	1994	Escort Service			x
Mara Beth Montag	1994	Escort Service			x
Brenda Zapatka	1994	Escort Service			x
John Bisanti	2005	Escort Service			x
Brenda Stewart	2010	Escort Service			x
Caroline Tilga	2011	Escort Service			x
Jody Hoskins	2012	Escort Service			x
Deanna Ruiz	2014	Escort Service	x		
Dennis Zarudny	2017	Escort Service			x
Melanie Smith et al.	2012	Escort Service			x
Theresa Faye Hope	2008	Escort Service	x		
Jami Kopacz	2021	Prostitution (Male)			x
Lynnette Harris	1991	Prostitution			x

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Adrian Coleman	1994	Prostitution			x
Christina Warthen	2008	Prostitution			x
Alexis Wright	2013	Prostitution			x
Veronica Fairchild	2014	Prostitution			x
Khemwika Ernest	2015	Prostitution			x
Perry Russell Tunnell	1982	Prostitution house			
Joseph Conforte	1980	Prostitution house			x
Steven Toushin	1990	Prostitution house			x
Francis Toms	1992	Prostitution house			x
George Blair	2000	Prostitution house			x
Keith Rainer	2018	Sex Trafficking			x
Nancy Adams	2007	Sex Trafficking			x
Lawrence Ray	2021	Sex Trafficking			
Timothy Houser	2020	Child Sex Trafficking			
Andre Taylor	2000	Child Sex Trafficking			
Sam Lindsey Massette	2018	Child Sex Trafficking			
Rebecca Dean	2006	Child Sex Trafficking			
Carl Nanni	1995	Facilitator accountant	x		x
Salvatore Scala	2005	Facilitator extortion			x
Paul Bergrin	2012	Facilitator attorney			x
Somad Enterprise	2012	Facilitator advertiser	x		
Julio Rivera	2018	Facilitator law enforcement			x
William Mersey	2016	Facilitator advertiser			x
George Ochs	1982	Facilitator loan shark			x
David Sturman	1991	Pornography	x		x
Ferris Alexander	1993	Pornography			
John Coil	2004	Pornography			x
Joseph Francis	2007	Pornography	x		
Francis Sharrak	2009	Pornography & Strip Club			x
Charles Resnick	2020	Sex Buyer	x		
John Kelso	2008	Sex Buyer	x		
Rafael Salas	2021	Sex Buyer		x	
Daniel R. Fruits	2020	Sex Buyer	x		