

Overcrowded Apartments

&

Human Trafficking

A Code Enforcement  
Perspective and Response  
to a Public Health Crisis

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*During this presentation, I will make references and generalizations regarding different nationalities, cultures and ethnicities in an effort to educate and bring attention to serious public health issues that plague most of our communities. This presentation is based on my experiences (33 years) in Local Public Health, interviews and research using peer reviewed, governmental and other respected resources.*

*Never should any of my comments or material be misconstrued or misinterpreted as racial, biased or prejudice. Thank you.*

## What are the relationships with Overcrowded Apartments & Human Trafficking

- Businesses involved with Human Trafficking want to house their employees together
  - If not illegally in the place of business
    - Back rooms of nail salons, spas and massage parlors
  - They purchase a home or homes and pack them in
- Better control of employees
  - Limit/prohibit freedom and communication to outside world
  - Provide transportation to and from work
- Intimidation
  - Physical and psychological abuse
- Fees
  - Charge for room and board, transportation, meals, etc.

What is the significance of the large passenger van?





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<https://www.thetimes.co.uk/article/the-slaves-in-your-weekly-shop-swhpxlhx2s>

<https://www.theguardian.com/society/2017/sep/20/london-council-finds-35-men-living-in-one-three-bedroom-house>



<https://www.nytimes.com/2015/05/10/nyregion/at-nail-salons-in-nyc-manicurists-are-underpaid-and-unprotected.html>



## Signs, Indicators and Red Flags

### **Suspect Housing**

- Passenger van parked with NY or NJ plates in/on property and/or pulls up to property most days and late evenings
- No other vehicles in/on property
- Shades/drapes always closed
  - When they are home, they are sleeping
- Little to no trash pick-up
  - They often eat at their place of work or on their way to and from work
- Minimally maintained property
  - Just enough to avoid attracting attention
- Taxes and utilities always paid on time and often in advance
  - To avoid any issues or visits
- No cable, dish TV or telephone service
- Property owner has NY or NJ address with Asian name

## Signs, Indicators and Red Flags

### **Restaurants, Nail Salons/Spas, Massage**

- Passenger van with NY or NJ plates parked on premises or drops off and picks up employees daily
- Same workers every day. Little to no change-over of staff
- If there are employee vehicles, they have NY or NJ plates

### **Nail Salons/Spas and Massage (illegal)**

- Signs of habitation
  - Break rooms with rice cooker, ovens, large full refrigerator
  - Cots, mattresses and/or bedding
  - Clothing hanging to dry
  - Single private rooms with “waxing” beds

### **Massage (illegal)**

- Shower stalls or wash tables (often without Building permits)
- Exterior cameras
- Dark parking lots
- Unassuming or modest building

## Signs, Indicators and Red Flags

### Massage (Illegal)

- Usually advertise sexually explicit massage on the internet with same phone number
- If person is a CT Licensed Massage Therapist
  - Lives in Flushing, New York
    - NY state Drivers License
  - Attended/Completed Massage Therapy school in Florida (fictitious school)
    - Documents provided to CT DPH for issuance of Massage Therapist License <https://www.elicense.ct.gov/Lookup/LicenseLookup.aspx>
    - Florida Department of Health Continues to Investigate Massage Therapy Schools Which May Be Involved in Selling Phony Degrees, Certificates and Transcripts <https://www.thehealthlawfirm.com/blog/posts/massage-therapist-scam-continues-florida-department-of-health-continues-to-investigate-massage-therapy-schools-which-may-be-involved-in-selling-phony-degrees-certificates-and-transcripts.html>
  - If asked if they commute everyday to and from Flushing, NY
    - Response usually is that they live with a boyfriend in CT
- If person is not a CT License Massage Therapist
  - Claims to not perform massage or did not know it was required
  - Provides license from NY or NJ

NEW YORK STATE DRIVER LICENSE NOT FOR FEDERAL PURPOSES

429 730 681

DUN  
PEIXIN  
42-55 GOLDEN ST. G.  
FLUSHING NY 11355

TEMP VISITOR 06/20/2020

DOB 03/11/1982

EXPIRES 03/11/2020

NONE

A1

ISSUED 10/01/2018



EMPLOYER'S COPY  
STATE OF CONNECTICUT  
DEPARTMENT OF PUBLIC HEALTH

NAME  
PEIXIN DUN

VALIDATION NO. 03-609712

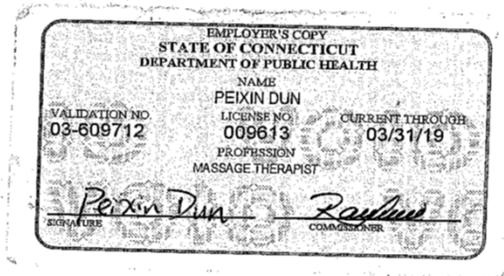
LICENSE NO. 009613

CURRENT THROUGH 03/31/19

PROFESSION  
MASSAGE THERAPIST

*Peixin Dun*  
SIGNATURE

*Rachel*  
COMMISSIONER



# Why is it a problem?

## Overcrowded apartments/homes:

- **Physical Health**

- Increase risk of spreading infectious diseases and other conditions
  - Influenza; Hepatitis A, B, C; TB; CA-MRSA; STI's; HIV/AIDS; Meningitis; Scabies; Lice; others
- Physical or sexual abuse
  - Not always same sex housing or separate rooms

- **Mental Health**

- Little to no privacy, peace and quite, or rest.
- Isolated from family and outside world
  - Little to no time off

- **Poor Housing Conditions**

- Better than where they lived before
- Scared to complain
  - Landlord is their boss

## Why is it a problem?

### **Human Trafficking**

- Forced/Coerced labor
  - Promised many different things
  - Minimal skills (cook or nail technician)
  - Language barriers
  - Sexual exploitation
    - Massage
    - Business owners and managers; house mates
- Low wages
  - Often, their wages go directly to pay their room and board
  - Often, laborers are working to pay off their debt to come to the US
  - Targets of theft and extortion
- Public health risks
  - Uninsured
  - Vaccination record
  - Exposure to communicable diseases, STI's and other conditions

## Target Population

- Cheap, plentiful, highly dedicated and reliable employees
- Never complain, no unions, no benefits, minimal skills needed
  - **For Labor jobs**
    - Restaurant and Food Service
      - Chinese, Korean, Thai or other “Oriental” style foods
    - Health and Beauty Services
      - Nail salons and spas
    - Domestic work
  - **For Sex jobs**
    - Commercial-Fronts
      - Massage, Spas, Brothels
    - Hotel/Motel-Based
      - Internet based
    - Residential Brothels
      - Unassuming single-family home

# Health Inspector Actions Lead to Human Trafficking Investigations in Network of Illicit Massage Businesses

February 25, 2019 - US Dept. of Health and Human Services Office on Trafficking in Persons

<https://www.acf.hhs.gov/otip/news/jupiter>

## How Florida police snared nearly 300, including Robert Kraft, at spas used for sex trafficking

[Rick Jervis](#), USA TODAY Published 5:06 a.m. ET March 8, 2019 | Updated 4:46 p.m. ET March 8, 2019

## 'No Allegations of Human Trafficking' and 'Women Could've Walked Out' In Florida Massage-Parlor Prostitution Stings

Authorities are walking back big claims about an international human-trafficking ring involving Patriots owner Robert Kraft.

[ELIZABETH NOLAN BROWN](#) | 2.25.2019 6:30 PM [HTTPS://REASON.COM/2019/02/25/FLORIDA-MASSAGE-PARLOR-SEX-STINGS/](https://reason.com/2019/02/25/florida-massage-parlor-sex-stings/)



## **What is the issue**

- Illegal massage parlors are a \$2.5 billion a year industry
- More than 9,000 storefronts in the United States
- Exist innocently and inconspicuously in every state

## **According to the National Human Trafficking Hotline**

- Nationally from 2007-2018
  - 178,971 calls to hotline
  - 40,200 cases
- CT Statistics from 2007-2018
  - 1,026 calls to the hotline
  - 319 total cases
  - 745 victims

## **Human Trafficking**

### **Who are the Victims?**

- Mostly women, but some men (food service and nail salons)
- Almost all recently arrived from China, Thailand or South Korea
- Recruited through fraudulent advertisements that promise big money and good working conditions
- Upon arrival they are lied to, threatened and manipulated into working or providing commercial sex for little or no money
- Often live on-site, 24 hours a day, or in same over-crowded home with other workers
- Workers are often rotated amongst businesses, once every 2-3 weeks
- Workers stay indoors the entire time
- Have tremendous debt or are under extreme financial pressure
- Speak little or no English
- Are often mothers in their mid 30's to late 50's

<https://polarisproject.org/beyond-raid-reporting-massage-parlor-trafficking>

## Restaurants/Food Service

### When does it become trafficking?

- When the employer or labor recruiter uses force, fraud, or coercion to intimidate the worker and to make the worker believe that he or she has no other choice but to continue working
- Common elements of force, fraud, or coercion in restaurants include:
  - **Force:** Restrictions on the worker's ability to leave the restaurant or housing, intentionally exhausting work hours, physical or sexual abuse, constant surveillance, lack of medical treatment for work related injury or illness
  - **Fraud:** Misrepresentation of the work, working conditions, wages, and immigration benefits of the job, altered or fake contracts, non-payment, underpayment or confiscation of wages, visa fraud
  - **Coercion:** Threats of deportation or other harm to the victim or the victim's family, confiscation of passports and visas, debt manipulation

<https://humantraffickinghotline.org/labor-trafficking-venuesindustries/restaurantsfood-service>



[https://www.wacotrib.com/news/police/authorities-raid-vegas-buffet-in-labor-trafficking-investigation/article\\_fb0040f7-ce39-52bc-9860-74eba480bdec.html](https://www.wacotrib.com/news/police/authorities-raid-vegas-buffet-in-labor-trafficking-investigation/article_fb0040f7-ce39-52bc-9860-74eba480bdec.html)



## Structure of an illegal massage operation

Fake massage businesses operate as an extensive, sophisticated organized crime network with multiple controllers who act in concert with each other

The various actors within the network include:

- The behind-the-scenes business owners who set up and finance the businesses
- The Brothel Keeper (BK) or “mamasan” who manage each individual location
- “Kitchen ladies” who function as a helper to the mamasan
- “Secondary brothel keepers” who function as a future mamasan in training
- Informal Asian “taxi drivers” who work for the network as transporters
- Recruiters
- Smugglers
- Attorneys who are paid by the network to represent any employee in the network in any legal matters

<https://humantraffickinghotline.org/sites/default/files/Fake%20Massage%20Businesses%20AAG.pdf>



## What you can do?

- **Find out who owns and operates the business?**
  - Pull the business license for details, and report on the business owners and operators
  - Many massage parlor owners also own other businesses, including other massage parlors, salons, laundromats, grocery stores that they use to launder money and hide the discrepancy between advertised prices and the extra money they get for providing commercial sex
  - Sometimes this information is publicly available, if not, consider cross-referencing advertisements to see for example, if a massage business shares a phone number with a nail salon
- **Find out who is the landlord or property owner?**
  - If someone is collecting rent checks, they too are profiting from an illicit business



## Enforcement Action

### Overcrowded housing

- Local Housing/Property Maintenance Code
- CT General Statutes section
  - 19a-206 - Nuisances and sources of filth. (a)...directors of health or their authorized agents **shall**, within their respective jurisdictions, examine all nuisances and sources of filth injurious to the public health, cause such nuisances to be abated or remediated and cause to be removed all filth which in their judgment may endanger the health of the inhabitants.... (b)When any such nuisance or source of filth is found on private property, such director of health **shall** order the owner or occupant of such property, or both, to remove, abate or remediate the same within such time as the director directs.
  - 19a-358 - Size of rooms in Tenement House
  - 19a-360 – Arrangement of rooms in Tenement House
  - 47a-52 – One and Two-Family rental dwellings
  - 47a-54 - Communicable diseases; unfit for habitation; order to vacate.
  - 47a-54a - Overcrowding in tenement and lodging houses

## **State Laws Relevant to Human Trafficking**

- Action for Damages Resulting from Trafficking in Persons: CGS section 52-571i
- Development of Response System for Victims of Trafficking in Persons: Contracts CGS section 54-234
- Display of Notice: Services for Victims of Human Trafficking at Highway Service Plazas, Hotels, Adults-Only Businesses, and Liquor Permittee Premises: CGS section 54-234a
- Forfeiture of Moneys and Property Related to Sexual Exploitation, Prostitution, and Human Trafficking: CGS section 54-36p
- Prostitution: Class A Misdemeanor: CGS section 53a-82
- Trafficking in Persons Council, Membership, Duties, and Reports: CGS section 46a-170
- Trafficking in Persons: Class B Felony: CGS section 53a-192a
- Training Program on Trafficking in Persons: CGS section 46a-4b

[https://www.acf.hhs.gov/sites/default/files/otip/connecticut\\_profile\\_efforts\\_to\\_combat\\_human\\_trafficking.pdf](https://www.acf.hhs.gov/sites/default/files/otip/connecticut_profile_efforts_to_combat_human_trafficking.pdf)

## **Laws Relevant to Illegal Massage**

### Federal

- The Trafficking Victims Protection Act (TVPA)
- The Mann Act of 1910
- The Racketeer Influenced and Corrupt Organizations Act (RICO Act)
- U.S. Code 1328 titled “Importation of Alien for Immoral Purpose”

<https://humantraffickinghotline.org/sites/default/files/Fake%20Massage%20Businesses%20AAG.pdf>

### State Licensing Board Regulations

- ? (show me the money)

### Local Ordinances

- Some towns have them, some do not

# MASSAGE LICENSE APPLICATION

**(Therapy, Therapist or Technician)**

Annual License Fee: \$100.00. Payable to PSHD

Date: \_\_\_\_\_ Type of Business: \_\_\_\_\_  
(Massage Only / Fitness / Full Spa / Physical Therapy, Other)

Business Name: \_\_\_\_\_ Phone # \_\_\_\_\_

Business Address: \_\_\_\_\_

Business Owner's Name(s)/ Address/ Phone: \_\_\_\_\_

Fax: \_\_\_\_\_ Email: \_\_\_\_\_

Property Owner's Name/ Address/ Phone (if different): \_\_\_\_\_

Hours and Days of Operation: \_\_\_\_\_

# of Massage Tables/Chairs: \_\_\_\_\_ Is there a sauna/steam room? \_\_\_\_\_ Are showers provided? \_\_\_\_\_

Do you provide towels, linens or sheets?: \_\_\_\_\_. **If yes, re-usable towels, sheets or linens must be properly washed & sanitized after each customer's use.** Check the following method you plan to use:

\_\_\_ An approved on-site washing machine using either hot water (min. 160°F) or an approved sanitizer.

\_\_\_ An off-site commercial laundry-mat (washing at home is prohibited). Provide name: \_\_\_\_\_

\_\_\_ An off-site commercial laundry service (pick-up and delivery). Provide service contract.

Provide Names and License #'s of all Massage Therapists/Technicians: \_\_\_\_\_

*Attach copies of all licenses to this form.*

*To the best of my knowledge and understanding, the information I provided above is true and accurate.  
I agree to comply with any state or local laws, regulations or ordinances regarding this facility and operation.*

\_\_\_\_\_  
Print Name Signature Date

\*\*\*\*\* Health District Only \*\*\*\*\*

Date Paid: \_\_\_\_\_ Amount Paid: \_\_\_\_\_ Check # \_\_\_\_\_ Permit issued \_\_\_\_\_

## Community Partners

- Building Official
  - Unsafe structure, occupancy issues
- Fire Marshal
  - Blocked egress, lack of smoke detectors or other hazards
- Police
  - Criminal activity, unregistered/uninsured vehicles
- Social Services
  - Assisting with essential services, minors, elderly
- Zoning
  - Excessive/unregistered vehicles, improperly zoned for type of use, excessive occupancy, other issues



[Call 1-888-373-7888 \(TTY: 711\)](tel:18883737888) | [Text 233733](text:233733) | [Live Chat](#)

**The End**

**Thank You**