

Thank you for your concern regarding illicit massage businesses, human trafficking, and exploitation.

I have been a professional massage therapist since 1983, in practice with my wife, Sheryl Rapée-Adams, since 1997. I am an ABMP member.

I oppose H.623. I have spent 16 years researching this topic with consistent results: Regulating massage therapists has no role in preventing or interrupting these crimes; regulating businesses that hire massage therapists might.

If regulating massage therapists worked, the 45 states licensing massage therapists would show some reduction in illicit massage businesses, human trafficking, and exploitation. Instead, it increases year after year. Paid sex work disguised as bodywork generates billions of dollars a year. With consistently high demand and huge profits, bad actors always find ways to circumvent the law.

I highly recommend reading the report at <https://www.linkedin.com/pulse/illicit-massage-businesses-cartel-finance-national-white-scaramucci-rlszc>, which describes the industry:

Illicit Massage Businesses (IMBs). Storefront businesses advertising massage/spa services while providing commercial sex under coercion or fraud. Typical signatures include opaque ownership (LLCs changing hands), heavy cash receipts, and advertising on adult classifieds or encrypted chat groups. Victims are often migrant women controlled through debt bondage and threats.

Please note the comment below the report, from AMTA Oregon Chapter member Donald F. Schiff:

The one thing we know that will NOT work is to place restrictions on massage therapists and massage practices. It has failed spectacularly for decades. Focus on unlicensed practice instead.

A *Forbes* article adds data and details:

According to [a 2018 study by the nonprofit Polaris Project](#), the illicit massage industry in America was estimated to generate about \$2.5 billion in revenue a year. [Kimberly Mehlman-Orozco](#), a human trafficking expert and author of the book *Hidden in Plain Sight*, puts that number considerably higher now—as much as \$4.5 billion in annual revenue (including what customers spend for a massage and sexual services), or about one-quarter of the overall [\\$16 billion](#) massage services industry.

Illicit massage businesses—which often use euphemistic terms like “body work” and “body rubs” to get around licensing laws—can be found in every state, from remote strip malls to bustling cities. In 2018, the Polaris Project estimated that there were at least 9,000 illicit massage parlors in America where customers can pay extra for manual relief, oral sex, or intercourse. That number is almost certainly too low by at least half:

RubMaps, a review site for “happy ending” massage parlors, lists more than 25,000 businesses in the United States.

<https://www.forbes.com/sites/willyakowicz/2021/04/04/inside-the-45-billion-erotic-massage-parlor-economy/>

An October 3, 2025, article in *BusinessNH Magazine* makes a compelling case for licensing businesses rather than practitioners and provides a much better avenue for law enforcement:

Alexander Kellermann, an assistant attorney general with the New Hampshire Department of Justice, said it’s like playing a game of “Whack-a-Mole.”

“It’s an endless cycle,” Kellermann said Monday at a legislative committee meeting addressing human trafficking linked to illicit massage parlors in the state. . . . officials say that when one closes, the owners often open another one in a different community.

In New Hampshire, massage therapists must be licensed individually, but the state does not currently require separate licenses for massage parlors or the establishments where they operate.

<https://www.businessnhmagazine.com/article/authorities-describe-shutting-down-illicit-massage-parlors-in-nh-as-playing-lsquo-whack-a-mole-squo>

A *USA Today* article describes the situation in Florida, which began licensing massage therapists in 1943:

In Florida – which ranks third after California and Texas for human trafficking reports – stings have been carried out against dozens of massage parlors. Those raids almost never led to trafficking charges.

Massage parlors seem to be in perpetual motion, as if stuck on spin cycle. Companies are incorporated and dissolved. Names and addresses are added and removed, swapped from one company to another or discarded when the pressure is on.

“It is frustrating for the investigators because sometimes it’s like sweeping water,” (a Miami Beach police captain) said. “No matter how hard you sweep, it still comes back.”

<https://www.usatoday.com/in-depth/news/investigations/2019/07/29/sex-trafficking-illicit-massage-parlors-cases-fail/1206517001/>

Burdening massage therapists with educational requirements and professional licensing beyond registration will not address the problem. Licensing establishments that hire employees or independent contractors might.

Finally, I update the testimony from my wife and business partner, Sheryl Rapée-Adams: Our professional organization, ABMP, has changed their stance and come out in favor of H.623. As ABMP members, we oppose this shift.

Sincerely,

Chris Adams
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