

## **Presentation to Regina City Council on Dec. 16, 2019**

### **Re: BYLAW NO. 2019-64 Proposed Zoning Bylaw Amendment – Body Rub Parlours**

Submitted and presented by Shayna Stock on behalf of 3 massage parlour owners. (Councillors have been provided with their names and addresses, but they do not want them to be publicly shared)

We are a delegation of massage parlour owners in Regina. For privacy reasons, we have asked Shayna Stock to represent us here today. However we are open to meeting with city council members privately to answer any questions they may have. In fact, we do find it kind of notable that with all the discussion that has gone on with this matter, as far as we know, nobody from council has made any attempt to contact any of the owners at any time. City administration did make an effort to contact the spa owners and many did meet with city staff. Some of our thoughts were included in their recommendations to you. It is unfortunate that some council members chose to ignore or disregard our input as nobody could be more knowledgeable on this matter than us.

We are here to ask council not to change the bylaw to restrict parlours to Industrial Zones only. We are also asking you to make parlours “permitted” use and not “discretionary” use. We are instead asking council to agree with the recommendations of City Administration and City Police and allow parlours to be opened in MAC zones; mainly the main corridors that are licensed for commercial activities. This is where most parlours are now located.

We have followed the debate closely and we thought the vote on September 23rd was the go ahead for licensing for which we mainly support. To now change the zoning bylaws before licensing rules have been finalized seems an underhanded way to pass restrictions before the licensing details could be discussed and approved. Permitted location of parlours HAS the biggest affect on existing parlours, and to set the rules without coordinating with licensing seems foolish and unfair. It appears to be a work-around strategy by those council members who failed to get an outright ban on parlours.

Before we get into why we think the proposed bylaw changes are misguided, a bit of background about the industry in Regina. We are talking about parlours owned by ladies of Asian heritage. The first parlour opened in December 2009 on Albert St, just over 10 years ago. Since then a number of ladies have seen the opportunity and opened parlours of their own throughout Regina, many on Victoria and Broad streets. They have been in both houses designated commercial, and strip mall buildings. We believe there are now 18 operating.

Many parlours have had the same owners over 5 years; some have been bought and sold several times, some are fairly new.

The market in terms of number of parlours has stabilized. Most ladies are reporting little or no growth in number of guests, in fact a slight downward trend. Council has no need to fear the number of parlours will continue to grow significantly; in fact a slight decrease is to be expected.

The reason the number has grown from 1 to 18 is pretty simple to understand. Demand. A very healthy demand. Ladies have not opened parlours to lose money. To setup or buy a parlour requires a fairly healthy investment; leases, renovations, equipment, signage, security cameras, etc.

There has been a lot of speculation about the owners of these parlours. We would like to clarify a few matters.

All parlours as far as we know are owner/operated. That is certainly the case of those represented by this delegation. The owners ARE the workers. There is only one or at most two ladies working in each parlour. These are not like the big spas you see in Edmonton or Vancouver where 10 to 12 ladies may be working. When we travel or leave town, we often get another lady to work as our expenses do not stop because we are not here. These ladies are usually from Toronto or Vancouver, and are licensed in those cities. We can guarantee they are not trafficked, underage, coerced or otherwise forced to work.

We have found much of the discussion about the owners of the parlours to be misinformed speculation. So for those that have never met us, let us be clear. The owners are the workers. We are not human traffickers. We are not exploiting workers. We are not members of organized crime. We are not victims. We are not pimping underage, vulnerable, desperate drugged-up girls. We are not the scum of the earth. To hear these accusations from some presenters and echoed by some City Councillors is hurtful, simply wrong, borders on slander, and reeks of prejudice.

This is what we are. We are Canadian citizens, or we are Permanent Residents. We are first-generation immigrants of Asian heritage, so yes, English is not our first language. We have all chosen to open parlours in Regina. Nobody has forced or manipulated us to be here. We have families, parents and children to support. We are not young, immature vulnerable girls. We are mature independent ladies, mostly in our 40's. We are strong, we are hard working, and we wish to cause no problems for the citizens of Regina.

We don't have to talk theory or speculate on the parlour business in Regina. We have real facts, real evidence; over 10 years worth to be specific.

As far as we know there have been no incidents of human trafficking, or violence, or robbery, or underage workers at any parlour in Regina. None of our clients has disturbed the peace, been assaulted, or assaulted anyone coming or going to any of our businesses. No drunk customers spewing onto the streets at 2:00 in the morning, no fights outside, no shootings, no car jackings, or other disruptions. No waves of cars driving by, no honking cars, no parking problems. To suggest parlours are the cause of crime in Regina is foolishness. A few anecdotal stories should not override years of facts.

At a very conservative estimate of 4 guests a day at each parlour, there would have been around 130,000 guest visits in the last 5 years. 130,000. With no problems. No incidents requiring police intervention. If there has been some that we are unaware of, the number would be very small in relation to the total number of guests.

A few words on our guests. Yes, they are vilified by some council members and delegations as the scum of society. But that has not been our experience. 99% treat us with respect; most are just lonely and want some companionship. They are your friends, your fathers, your grandfathers, your brothers, your uncles, your husbands, your sons, and your nephews. We understand this goes against the public perception. But again we have 10 years of evidence. And around 130,000 visits in the last 5 years as evidence to the contrary.

We are against the proposal to ban parlours on major corridors for 3 main reasons.

The first is the safety issue. Traffic, lighting and police presence are significantly less in the Industrial zones as opposed to major corridors. There was much discussion on this issue in the workshops and the general consensus was that “ghettoizing” parlours and the people that work in them was a bad idea. In many locations they would be the only business open in the evenings. There is often no public transportation and many of the ladies do not have vehicles.

There has been much talk in council about concern for worker safety. This proposal seems to say all that talk was meaningless.

The second reason is the cost to us. The proposal is basically a theft. It robs us of our investments, of our savings, and of our future earning potential. Many ladies have spent tens of thousands of dollars to buy parlours, or to renovate locations. This money would be lost. The ability to sell their parlour would be gone as the current locations would become worthless.

The cost to move to a new location is significant. New leases, new deposits, renovations, signage, etc. The number of suitable locations is limited in the Industrial zones.

We estimate that the combined loss in value of closing an existing parlour and opening a new parlour could average \$40,000 a parlour. Probably more. This times 18 parlours is \$720,000. Maybe for higher-income council members that is not a lot of money but for us it is.

The owners of our buildings will also be harmed. At an average rent of \$2,000/month that is \$36,000 or \$436,000/year of lost revenue to them. Yes, they can rent to other tenants but most of these properties are not prime real estate, and for many it will be difficult as you can see by the already large amount of available commercial real estate in the city.

The third reason is the unintended consequences. At any given time based on advertisements, we estimate there are 40 to 50 women working from houses, apartments, airbnb's, and hotels in Regina. The houses, apartments, and airbnb's are in residential areas. If you put onerous restrictions on parlours, many ladies may be forced to follow that path and go "underground". You would get more, not less ladies working in unlicensed locations in residential areas. No regulations, less safe for ladies and guests, more opportunities for bad things to occur. In other cities almost all of the crime and violence against ladies occurs in unlicensed residential establishments, not licensed parlours.

We find that with all the attention that our parlours have gotten, little or no attention has been paid to these women by City Council or City Police. We also note that the vast majority of these women are white, whereas the proposed bylaw directly affects and punishes parlours owned by ladies of Asian heritage. It also maybe just a coincidence, but it appears that the only parlour not affected by the new location rules is in fact owned by a white lady, who is not a worker herself. It is difficult not to believe that a degree of racial stereotyping instead of facts has gone into some councillors' decision making.

The proposal to make licensing of parlours "discretionary" is clearly an attempt to make the process overly difficult and intimidating, especially to those owners whose first language is not English. City staff and city police are fully capable of doing background checks and ensuring owners are acceptable. Requiring council approval of each parlour is unnecessary and a waste of your time. The process would invite more of the same baseless accusations that have dominated the current debate over licensing. At the very least existing parlour owners should be granted an exception.

It appears that most of the complaints are about a few parlours that have opened in residential only areas. We are opposed to this too and agree they should be forced to move. There also seems to be some complaints about signage and blinking lights. While we could argue that none of our existing signage is risqué, depicts nudity, or is offensive in any other way, this issue can easily be dealt with by common sense regulations as part of a comprehensive licensing program.

But to punish the existing parlours located on major roads in commercial areas appears a harsh solution to a minor problem. A blinking lights problem.

In summary, we could find many things in Regina that might “offend” us. Numerous bars where the damage caused by some intoxicated guests in terms of violence and DUIs is horrendous and tragic. We see a casino and VLT’s that have stolen millions and millions of dollars from people and ruined lives. We see numerous cannabis shops that we believe encourage young people to waste their lives in a haze. We read about drug usage and overdoses and so many deaths of young people. We know pornography is readily available on our computers and televisions. We read daily police reports about murders, robberies, home invasions, carjackings, and shootings. Regina has many issues to deal with.

Yet it appears some members on city council and a few citizens are obsessed with a few businesses with blinking lights and flashing Open signs. That they ruin neighborhoods and cause an increase in crime. We would suggest 10 years of evidence shows no such thing. To punish us now by ghettoizing us to industrial zones is extremely unfair, robs us of our assets, seems prejudicial in nature, and in fact will increase the dangers to us that council was reportedly trying to prevent.

We respectfully ask you to reconsider this proposal.

Thank you.

Shayna Stock