



CITY COUNCIL

**Wednesday, September 2, 2020
1:30 PM**

Henry Baker Hall, Main Floor, City Hall



OFFICE OF THE CITY CLERK

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**Agenda
City Council
Wednesday, September 2, 2020**

CONFIRMATION OF AGENDA

DELEGATIONS, COMMUNICATIONS AND RELATED REPORT

- DE20-84 Janet Michaylow: Body Rub Establishment Licensing Program
- DE20-85 Chris McDougall: Body Rub Establishment Licensing Program
- DE20-86 April Eve Pearl Wiberg, Stolen Sisters and Bothers Movement: Body Rub Establishment Licensing Program
- DE20-87 Harry Rohde: Body Rub Establishment Licensing Program
- DE20-88 Isabelle Henault: Body Rub Establishment Licensing Program
- DE20-89 Deanne Makellky on behalf of Daria Frostad: Body Rub Establishment Licensing Program
- DE20-90 Karin Boehler: Body Rub Establishment Licensing Program
- DE20-91 Bruce Ellergodt, Freedom Catalyst Alliance: Body Rub Establishment Licensing Program
- DE20-92 Marilyn Phillips: Body Rub Establishment Licensing Program
- DE20-93 Ed Smith: Body Rub Establishment Licensing Program
- DE20-94 Angie Ivey: Body Rub Establishment Licensing Program
- DE20-95 Devon Hill, Freedom Catalyst Regina: Body Rub Establishment Licensing Program
- DE20-96 Carla Taylor-Brown: Body Rub Establishment Licensing Program



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- DE20-97 Pam Shaheen: Body Rub Establishment Licensing Program
- DE20-98 Carla Johnson: Body Rub Establishment Licensing Program
- DE20-99 Jane Gattinger: Body Rub Establishment Licensing Program
- DE20-100 Christy Kasur, Mastery Massage Inc.: Body Rub Establishment Licensing Program
- DE20-101 Marilyn Degelman: Body Rub Establishment Licensing Program
- DE20-102 Andrew Waithe: Body Rub Establishment Licensing Program
- CP20-41 Shayna Stock, Heritage Community Association: Body Rub Establishment Licensing Program
- CP20-42 Andrea Heinz: Body Rub Establishment Licensing Program
- CP20-43 Chelsa Budd: Body Rub Establishment Licensing Program
- CR20-78 Executive Committee: Body Rub Establishment Licensing Program

Recommendation

That Council:

1. Approve the implementation of a licensing program for Body Rub Establishments as outlined in Appendix B, to include:
 - a. Licensing for establishments;
 - b. Requirements for workers and establishments including: criminal record checks, completion of an education program, proof of age and ability to work in Canada;
 - c. Reporting requirements;
 - d. Health and safety requirements;
 - e. Limited hours of operation.
2. Direct the City Solicitor to prepare the necessary bylaw to implement the licensing requirements as outlined in Appendix B Licensing Requirements, to be brought forward to the meeting of City Council one month following the disposition of this report.
3. That the workers be licensed and that the requirements for worker licenses be as follows:



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- Attendance in person to produce government issued photo identification containing legal name and age to be at least 18 years;
 - List of all aliases and/or pseudonyms;
 - Proof of completion of BRE education program;
 - Legally be eligible to work in Canada;
 - Proof of permanent residency
 - Certificate of approval from the Regina Police Service; and
 - Submit license fee of \$100
4. Increase the licensing fee for owners/operators to \$1,200
 5. Approve that a minimum fine of \$2,000 be enforced in the case of an individual owner/operator for a first offense.

ADJOURNMENT

To: Regina City Council
re: Body Rub Establishment Licensing

The Protection of Communities and Exploited Persons Act (PCEPA) has made it legal to sell intimate body massage to protect the vulnerable trapped young workers from further injury from our justice system.

However, PCEPA still makes it illegal to purchase these services (johns), for others to profit from the sale of it (owners/pimps), or advertise (by owners/pimps only).

- You have voted to allow body rub establishments in our Regina industrial areas. I am in opposition to allowing them in Regina.
- You will be voting on licensing the owners or operators (pimps) as recommended by Regina City Administration. This is still illegal in Canada as clearly outlined in PCEPA. I am in opposition to licensing them. We cannot and should not license illegal activity in our City. Illegal activity should be enforced to be stopped, not sanctioned through licensing.
- While the claim of those recommending licensing is that our street workers will be better protected; I disagree. Past workers of other licensed body rub establishments in Canada report, or are found, to being abused, neglected and trapped. These establishments are known to employ vulnerable Asian women; and not Regina street workers in most cases.
- If these owner/operators (pimps) are licensed, it will be nearly impossible to arrest and charge them for pimping, since that is what they would be licensed/sanctioned to do by our city officials.
- If workers are licensed, during the application process, there should be something enacted where if any deception or falsehood is used (e.g., stating owners are not involved, but they are found out to be involved), that would be cause for automatic revoking of the license and a ban on re-applying for multiple years. There needs to be proper documentation in place during the application that the workers can attest/sign that owners are not involved.
- In addition, please ensure that our police hands are not additionally tied by requiring them to give notice before attending these establishments for checkups, since this would allow all evidence of human trafficking or owner/pimp involvement to be removed in advance.

Please do not allow or license pimps/owners in our city.

Please put in the proper paperwork during the application process to ensure workers attest/sign that no owners are involved, and that licenses are revoked (and reapplication cannot occur for several years) if any false statements are made during the application. This is a critical requirement for the safety of the workers to add proper checks and balances to protect against possible human trafficking situations from occurring.

Please allow police to do their job without hands tied by allowing them to check up on these body rub establishments unannounced (without having to book appointments in advance).

Your citizens are counting on you. Thank you!
Janet Michaylow

I believe that what goes on in Regina's massage parlours can be described by two words. Those words are 'slavery' and 'rape'.

These may sound like strong words, but consider the following:

There is plenty of evidence to support that a high percentage of the girls working in those establishments are there by coercion or manipulation, if not by force. Any act that is being done by coercion, manipulation, or under some sort of duress is an act that is being done without true consent. Many – if not most – of these girls have been coerced or manipulated into working in these parlours and are having sex with multiple partners a day. Coercing, manipulating, or forcing someone into having sex is the dictionary definition of 'rape'. We live in an age where we are trying to do more and more to help young people understand the true meaning of what is consent and what is not consent in order to reduce the number of sexual assaults that are happening to young women and girls. If the lines of consent are blurred or ignored, then we call it rape. In these massage parlours, the lines of consent are often very blurred or outright ignored. In any other context, we would call this 'rape' and that's what we should be calling it in this case as well.

The other word is slavery. The term 'human trafficking' is synonymous with the word 'slavery' and we are naïve to say that human trafficking is not what's happening behind the doors of those parlours. History will remember the global human trafficking epidemic for what it is: slavery. And it's slavery of the worst kind.

I recently watched a few excellent movies about slavery in the historical context: Lincoln; Amazing Grace; 12 Years a Slave. They're all great movies; some of you have probably seen them.

The thing I find most interesting about those movies is watching the political debates around the abolition of slavery. The debates in British Parliament, US Congress, and town hall meetings, not unlike the town hall meeting that is happening right now. Watching politicians from a few hundred years ago argue in favour of keeping slavery is fascinating. In addition to arguments of the economic benefits of slavery, there were political figures actually trying to argue that slavery was compassionate and presenting what they felt were very compelling arguments. Today, those arguments are remembered as being repugnant. History does not care about all of the nuances of why people thought slavery was justified and the idea that people thought it was compassionate makes people angry today, as it should. History recognizes that slavery was wrong and people who tried argue in favour of slavery are now remembered as being on the wrong side of history, and that's where they belong.

History will remember today's global human trafficking epidemic the same way. Human trafficking will be remembered as slavery, and it will be remembered as non-consensual sex, 'rape'. History will not care about all of the nuanced arguments that people are putting forward; it will simply remember the people who contributed to human trafficking, the people who ignored human trafficking, and the people who stood against human trafficking. People who contributed or ignored it will be on the wrong side of history, and people who stood up against it will be on the right side of history.

So what side of history will Regina be on? How will people remember how Regina handled slavery and rape? Did we license and regulate it to reduce its risk? Did we pass zoning laws to keep it out of residential neighbourhoods? Did we decide that slavery and rape was only acceptable in industrial neighbourhoods? Or did we stand up and say 'No! Not in our city!'"? How will history remember Regina? How will history remember your vote?

My stance on this issue is clear. I encourage you to vote today in such a way that you can drive past a massage parlour later tonight with a clean conscience believing that you have genuinely tried to do right by the people inside those buildings.

Chris McDougall

Tansi/Hello.

My name is April Eve Pearl Wiberg. I am a member of the Mikisew Cree First Nation (*Treaty 8*). I am a survivor of sexual exploitation and founder of the Stolen Sisters and Brothers Movement, a grassroots movement for Missing, Murdered, and Exploited Indigenous People: <https://www.facebook.com/StolenSistersAndBrothersMovement/>

I am sharing my story of sexual exploitation and traumatic experience working in licensed body rubs with you today with hopes your decision as leadership will save countless vulnerable women and girls from a very destructive and harmful form of survival. Licensing does not save lives, it does not improve wellbeing, nor provide safety or a safer environment to sell sexual services. Licensing does not shield providers from degradation, physical, mental, and spiritual harm and trauma. Licensing only protects the tax paying owners and buyers and it certainly provides a toxic environment that perpetuates organized crime. As an advocate for Missing, Murdered and Exploited Indigenous People, I believe this harmful industry is a leading factor in the national Missing, Murdered, and Exploited Indigenous Women and Girls (MMIEWG) crisis.

As an Indigenous survivor of sexual exploitation, I know first hand the harmful effects of the so called “sex industry”. During my exploitation I was warned never to reveal my true ethnicity as a Cree/Sioux Icelandic woman. I was warned from the get-go of my exploitation that revealing my ethnicity to a “client” that identifying as an Indigenous woman could get me killed, short-changed, beaten or robbed. Sadly, the Canadian wide epidemic of racism exists even in the underbelly of society as such as sexual exploitation and that revealing my ethnicity as an Indigenous woman could cost me my life. Therefore, I was sold and advertised as an “exotic”, and depending on my hairstyle, clothing I could be anything from Japanese to southeast Asian, Italian but most often I was sold as a Latina and my prostitution name often reflected as such (Maria, Mia, Monet etc). I was exploited in multiple cities in both Canada and the USA however my journey began in Saskatoon Saskatchewan.

15 years ago, I was self-liberated from sexual exploitation however the time has not healed the life long trauma being involved in this harmful industry. To this day I suffer from PTSD, severe anxiety and depression. I have identity and trust issues and I have a very difficult time with my sexual intimacy as I am often dealing with triggers of my trauma (*smells, sounds, people, places, things etc.*). It was a very difficult transition exiting out of prostitution. There were very few resources except for CEASE (The Center to End All Sexual Exploitation) an Edmonton based non-profit organization who at that time offered exited peer led support/sharing circles. I had just returned from living in the USA, where I had been exploited by New York City based organized crime unit. I would like to acknowledge that CEASE saved me from returning to my exploiters providing me with the support to exit prostitution for good. Today, with encouragement from my fellow survivors and advocates, I have just recently “came out” sharing my story of sexual exploitation publicly, first sharing my truth with the Edmonton Journal and then the international media outlet Aljazeera:

<https://edmontonjournal.com/news/local-news/canada-needs-to-recognize-human-rights-crisis-revealed-by-final-mmiwg-inquiry-survivor-says>

<https://www.aljazeera.com/indepth/features/pipelines-man-camps-murdered-indigenous-women-canada-200412064302356.html>

I was targeted and groomed at the age of 19 by another young woman while living in Saskatoon, Saskatchewan. At that time I was working two minimum wage jobs and just barely getting by. I lived in a low-income neighborhood and was harassed daily by sex buyers who would come into my neighborhood driving around looking for Indigenous women and girls to sexually exploit and harm. I was at that time never in the mindset of ever resorting to prostitution. I knew it was incredibly dangerous, especially for Indigenous women and girls who were racially targeted for sexualized violence, often beaten, going missing or found murdered. At that time I was often yelling and confronting sex buyers and pimps while they were harassing me and others in the neighborhood. I hated them and I felt the need to protect the women and girls being harmed.

I know now the situation that led me into the clutches of prostitution was the “perfect storm”. My mother, an Indian residential school survivor abandoned me at the age of 1 years old, leaving me with my biological father. I grew up on an isolated farm with my father and stepmother in rural southern Saskatchewan and as a child I lived in constant terror of my abusers. There were no safe spaces, both home and school were places of abuse and torment. As a child I was subjected daily to child abuse and racism. I had very low self esteem (*if any*) and I was accustomed to being unclean and having very little. I was always hungry as my abusers used hunger as a form of discipline. I remember my sister and I crying all the time, devising plans of escaping or someone coming to save us. But no one came, and we suffered, we became hopeless and our hearts full of anger and fear.

At the age of 16 my father kicked me out after finding out I had plans of running away to live with my mother for the first time in Edmonton, Alberta. He bought me a one-way Greyhound bus ticket to Edmonton. I left Saskatchewan with just a teddy bear and a second-hand suitcase hoping for a better life with my biological mother.

At the age of 17 I was abandoned in Edmonton for a second time by my biological mother. She moved to Vancouver with my younger siblings. I had nothing except the clothes on my back, I dropped out of grade 11 and I spent the next year and half struggling working a retail job, introduced to cocaine and beaten by an older boyfriend who himself was being sexually exploited (as a male stripper), ending up homeless, couch surfing in Edmonton. I tried to get help from social services as well a local youth shelter but was coldly turned away. I reached out to a childhood friend who was going to school in Saskatoon and she offered me a place to stay. Within months of being in Saskatoon I was targeted and groomed into sexual exploitation. I was first “turned out” in a trick pad (which was a small older house in residential Saskatoon just on the outskirts of downtown, an unlicensed place advertising by word of mouth body rub- adult services). The owner eventually leased a “massage studio” in an industrial part of Saskatoon where he and his same sex partner operated a body rub advertising the adult services in a local newspaper.

Dear respected Regina City Council members, if there is only one thing that you take away from my truth today is that licensed body rubs is an industry that is harmful and it affects women and girls in a very destructive way. Licencing only protects the exploiters and buyers. This is an industry that is part of the national human rights crisis of Missing, Murdered and Exploited Indigenous Women and Girls. I believe that there are many like me, Indigenous women and girls being sold as “exotics” in body rub establishments. Please, be a part of the solution to combat human trafficking for the purposes of sexual exploitation and make the right decision to save precious lives and empower and support all women and girls.

All my relations. Hiy hiy kinanaskomtin/thank you. – April Eve

Dear Mr. Mayor and City Council Members,

My name is Harry Rohde and I am representing myself and my family. I apologize for our late response to the issue of the approval and licensing of body rub establishments. I only became aware of the upcoming vote at City Council on August 15th. I don't follow the news much and didn't even realize that the City had even approved these type of businesses. I thought this issue was laid to rest in 2015, after City Council denied the land use application for a strip club. At that time, I presented a petition with signatures from many in our neighbourhood, and many other groups made presentations as well, opposing the establishment of these types of businesses since they do not contribute to a healthy society and are a detriment to encouraging healthy relationships between men and women. Therefore, we implore you to vote against the licensing of body rub establishments and do not approve these type of establishments in our City.

I did review some of the information prepared by the City, and can see that a lot of effort has been made to try and address this issue and properly manage this industry. However, we first need to realize that encouraging this industry is harmful to all women, not only to those who are often trapped in this industry, since this practice is degrading to women and continues to portray them as sex objects that can be bought for a price. Personally, it's hard for me to fathom in this day and age, where women have made such advances, and as a society where we are correcting many long-standing inequalities such as slavery, segregation and racism, that we continue to tolerate sexual exploitation of women.

Besides being extremely demeaning and disrespectful to women, this practice of purchasing sexual services is still illegal in Canada and it is also illegal for others to profit from the sale of these services or advertise these services (Protection of Communities and Exploited Persons Act - PCEPA). By licensing the owner of these establishments you are allowing the owners(pimps) to advertise and profit from the sale of the services provided by their workers. Also, the clients are purchasing these services which is also illegal. Also, by licensing these owners (pimps), it legitimizes these establishments and makes it nearly impossible to arrest and charge them for pimping, since they City has allowed them to operate in this fashion. I believe once you take the step to license the owners of these establishments, you will open a "Pandora's Box" and this will potentially lead to increased human trafficking and sexual exploitation of women, which is already a worldwide problem.

Our City needs to take a more proactive approach. It's easy look at other jurisdictions and conform to the way everyone else is operating, but it takes bold leadership to change an attitude. Most businesses operate under the principle of supply and demand. In addressing this issue, we tend to look at the supply end (pimps and sex workers) and forget about the demand side (clients). I challenge you to address the demand side - the men who are seeking out these establishments and sexual services. These men are also inflicting long-term harm on themselves and other women, since they will not know how to develop healthy and respectful relationships with women. Our young men and women need to be properly educated on how to develop healthy relationships with the opposite sex that motivates them to build a healthy and progressive community that promotes mutual respect.

We all have pride in our City, and I know you Mr. Mayor and members of City Council want our City "to be the best that it can be" otherwise you wouldn't have taken on these leadership positions. However, remember, you were elected to be our leaders, not administrators, and in this

leadership role you must always do what's right for the betterment of our community and look to things that will propel us forward and not pull us back. I personally cannot see how approving and licensing these establishments will be for the betterment of our City and only see potential problems and pitfalls. As residents of Regina, I strongly believe that we should leave a legacy for future generations that shows that we stood for a healthy and progressive society where women and men were equally respected. I would be ashamed of myself if I didn't speak up on behalf of my family and neighbourhood and I hope that you, as our City Council, will not be afraid to speak against this proposal on behalf of your families and your constituents, and that you would promote a higher set of values that we as a progressive society should adhere to, so we continue to show proper respect to the women in our society. If you agree, I urge you as our City Council to vote against the licensing of body rub establishments in our City.

In closing, I would urge you all to step up and lead; to be the leaders that the residents of Regina can be proud of. What sort of legacy do you want to leave for future generations? One that shows our apathy where we shrug our shoulders and say, "well, it will happen anyway, there's no way to stop it"; or where we finally say, "enough is enough" and shape a society that shows our sons and daughters, and those that chose to make our City their home what a well-functioning community looks like, where men and women are equally respected and not portrayed or viewed in a demeaning or disrespectful way. Personally, I would be ashamed and embarrassed to have to face my children and family and say that I allowed this to happen when I had the power to stop this.

We all know what is inherently right or wrong, because we have a conscience, which will either "accuse us" or "excuse us" when we face questionable issues. I know you want to do what is right for our City and by listening to your conscience and voting against the licensing of these body rub establishments, your conscience will excuse you. In 2015, you made the right decision and this was further demonstrated later that Spring when the province also banned strip clubs.

Therefore, as our elected officials, I again challenge you to step up and do the right thing for our City. It's easy to conform to what our jurisdictions are doing, however, you still have the power to shape the development of our City and make it the "best that it can be" – so do it!

Respectfully yours,

Harry Rohde



When I moved to Regina seven years ago, I kept telling people that if I had kids, it would be a beautiful place to raise them up. Surrounded by spectacular prairies, this city had the perfect size, an accessible sky, welcoming people, a "feel good" life rhythm, community neighborhoods, several churches and a big nature area right in the middle. What I needed, wanted and chose.

Although life was promising to be good in my new home, over the years, I witnessed (I myself saw and heard and from others) a high level of distress and violence in this city that seems to kept increasing around me in the last three years to the point of making me feeling anxious, disappointed, trapped in my own house. Almost every single night, I can hear "how the city lost control". As a citizen of Regina, as a woman, as a single, I do not feel safe at all in Regina anymore, because what I see and hear every day, is that my city is controlled by criminals, doesn't matter what we say about it, it is my daily reality. I am losing my quality of life slowly day by day. Why am I so mad now? My anger equals my fears. I am afraid. If this is Regina right now, what will it be tomorrow?

Now, the city council wants to vote a bi-law in favor of licencing the body rub establishments (in other words "the pimps") in Regina. I am appalled by the idea of it. I do not understand which messages and values we want to promote as a city. As a woman myself, I feel disrespected and unsafe. What do you want men thinking about women in this city? How do you want male teenagers think about women in this city? How do you want our boys thinking about women in this city? How do you want women thinking about themselves? How will you educate and build up self image, self respect and self confidence in your daughters, Regina? And to your boys to respect them as persons?

Who are the clients of those body rub establishments? They're right in your family, your street, your neighborhood. What are we doing to our families? To our couples? By allowing criminals to exploit women and destroy. Destroying women, destroying families, destroying quality of life in the city, destroying dreams and hopes, destroying our values, destroying our city. When we destroy, we don't built. I wish the city council wants to build up a city with justice, righteousness and peace that will offer a future, goals, dreams, hope and beauty to his citizens and future ones. I wish that we would be recognized as a city that stood up and found her way back to honorable values.

A place where it is good to raise kids.

Isabelle Henault

Dear City of Regina,

Please do not vote in favour of licensing the owners and operators (pimps) of body rubs.

Under Canadian law, PCEPA, prostitutes as well as body rub workers are protected because they are seen as victims. However, it is illegal to purchase these kinds of services or to advertise them and profit from their sales. The latter is exactly what the body rub owners are doing. It is illegal.

If you do some searching on massage parlours in the news, you can find numerous news articles of stories both in Canada and in the United States of police busts done on these places. They all look the same as the ones in Regina. They have covered windows and bright "massage" and "open" lights flashing on them. The workers are primarily Asian. There are human trafficking rings which are a form of organised crime that bring in Asian women to North America to work in these places. Many women are forced into this through psychological manipulation and abuse, threats to their family and in general being exploited at a time when they are vulnerable. Many of them claim that they do not even speak English.

I used to live in a neighbourhood close to the massage parlours. I have watched and observed them. I've seen men drive up to a massage parlour and text on their phone. In a few minutes a worker would come out and go into the man's car and he would drive away. To where? Do you think she is safe? Imagine if this was your daughter, sister or niece. It is dangerous and exploitive. What if the women in there get sick? What if they want out? If they were hurt, would anyone know? Do they even have access to basic medical care? No, they don't have rights in those buildings and allowing the pimps to be in charge is like letting the fox rule the henhouse. This is unacceptable.

Please don't think of this as some kind of "empowerment for women". Listen to your conscious and vote the right way. You are in a position of authority, please make a difference that is good. Even if it may be unpopular to some.

If these owners and pimps are licensed by our city then it will be impossible to arrest and charge them for what they are doing. Please stand on the side of the victim. Be a voice for those who cannot speak here for themselves.

These women need our help, they don't need us to empower their abusers.

Daria Frostad

August 20, 2020

To our elected Councilmen and Councilwomen of Regina,

Thank-you so much for the opportunity to share in this discussion.

Once again, the subject of licensing body-rub parlours is coming into question. At this point, the question before city counsel is should we, or shouldn't we license the people operating these establishments?

I am of the strong opinion that we should not.

Recently, I undertook some research in the area of sex-trafficking.

Sex-trafficking is the fastest growing area of crime in the world, with one quarter of the victims being children ... and the demand for younger pre-teen children is increasing.

The greatest consumers of trafficked children are North American men.

I will draw heavily from what I learned through an undercover police agent who has used his undercover skills to develop a search and rescue agency whose mandate it is to find and free children from the sex trade. His well-established and highly regarded agency, which has successfully found and rescued over a thousand children to date, is called "The Underground Railway". Information and statistics on his ongoing work can be easily searched and verified on the internet.

The undercover Police Officer appeared on the Candace Owens talk show, around the question, "should prostitution be legalized?" I watched that program and noted a few things pertinent to what I am sharing today concerning decisions presently being made in Regina.

In considering the question ... should prostitution be legalized? ... The undercover Police Officer offered his perspective. He said, "I have an advantage in that I know these guys (sex-traffickers). Through many undercover operations, I have spent time with them. I know how they think. They are businessmen out to make money ... and they will use legalization as a front for illegal activity. If there are 10 legal women available, there will be 10 illegal situations available in another room - for more money."

It is a known thing that Regina is one of the cities that traffickers use as they move women (possibly teens and children too) around. For anyone who has looked into this matter even a little, that is common knowledge. Regina is one of the western "hub" cities traffickers use.

I believe we want to make it harder ... not easier ... for traffickers to operate in our city. However they dress it up or hide it or hire their own staff - I believe that these body rub parlours are or will be a front for the purchase of sex - and in the long run nothing "good" will come of legitimizing such owners. If an inch is given, a mile will be taken.

A body rub parlour, if it isn't happening already, is a step TOWARD the sale of sex ... not AWAY from it. I believe we are obliged as citizens and law makers and law enforcers to protect people by making legal and lawful decisions that move people AWAY from the sale of sex.

At one point in time, a large delegation of concerned citizens came to City Hall and spoke - and because of that collective and broad public outcry - you changed your minds as a council. That was to do with the strip club.

A body rub parlour has the same potential negative outcome for our city ... the exploitation of women, harm to our children, and the likelihood of the sale of sex.

There are as many concerned citizens now as there were then, and that is STILL the broader public outcry. Please make this decision with that initial outcry in mind. Please do not take steps toward legitimizing the sale of sex in our city.

Thank-you

Karin Boehler

In the end, what will hurt us the most, is not the words of our enemies and the silence of our friends.
(Martin Luther King)

Men have been silent far too long about our abusive culture against women

My liberation as a man is tied to the liberation of women.

It has been acknowledged and stated by counselors that Body Rub Parlours are illegal. They are illegal brothels desperately trying to fly under the radar and be seen and accepted as legit. You have also acknowledged that the sex trade is a high-risk occupation for which we need to put into place safety measures and protocols for the women.

A significant measure that needs to be in place to insure not only the safety of the women but the legality of their presence working in a Body Rub Parlour is the freedom of our police and Occupational Health and Safety to randomly inspect these establishments. Are the buzzers working? Are all the women licenced? Are there any underage workers? Are any of the body rubbers living on premises?

Our police, and occupational health and safety people must have the freedom to do their job without having to adhere to a bylaw that was designed for squeaky clean, above board business.

Does an OH&S officer drop by a construction jobsite, inform the general contractor that he or she will be making a safety visit in the next 48 hours? Of course not. Why not? Because it is in the surprise, its in the unannounced inspection that illegal, unsafe, criminal and bylaw infractions are uncovered. To give the sex industry a warning of a planned inspection is ludicrous. It's like informing the meth lab, or the terrorist cell that there will be an inspection on August 27th, at 3:45 pm. Please open your eyes to the deceptive, manipulative and downright illegal business you are sanctioning, while at the same time limiting the power of our police to take action at the best possible time; when they don't expect it. And at the same time giving the power back into the hands of the exploiters when you let self regulate.

Please recognize the criminal, illegal and exploitive nature of this business. Please create an appropriate bylaw that recognized this undisputable fact to insure our police, bylaw officers, occupational health and safety officers are not denied reasonable access given this is an illegal activity making it an "extraordinary circumstance".

You are understandably committed to carrying out the letter of the law. These bylaws make sense because they are designed for the 99% of businesses that are squeaky clean, above board and legal. With BRP we are dealing with a completely different monster. Why are you so committed to following the guidelines set out in the bylaws, while you seem to have little regard for the PCEPA and its laws.

It may not be illegal, but it is immoral to give the exploiter unfettered freedom to hide and exploit with impunity.

What we are saying is simple: Come, organized crime. Come pimps. Come explosive Johns, we are open for business. Bring your trafficked women, take our women, we will turn a blind eye to your illegal activities and today we plan to pass a bylaw that will make it easy for you to traffic and sexually exploit women through your illegal but licenced Body Rub Parlours. We are going to make it easy for you to avoid detection and harder for your nemesis, the honorable Regina Police Service to investigate, arrest, charge and prosecute you. So come, enjoy and

Please amend the Body Rub Parlour bylaws to protect vulnerable and exploited women not just to align with a bylaw that was not designed to protect the sexually exploited. Our police need the freedom to carry out their duties to protect and

Two year review.

How did the police handle the illegal cannabis stores?

The bottom line is, you are debating the sanction of an illegal activity. To justify what you are doing, you have to stick your head in the sand, hum as loudly as you can to drown out the voices of justice and plow ahead because it is easier to walk the path of least resistance than to stand up for the abused and stand against the exploiters. Just because you are a councilor on a city council doesn't give you the right or the privilege to legitimize an illegal activity.

Justify your choices by believing you are liberating women. Nothing could be further from your truth. BRP are brothels. Brothels are places where sex is exchanged for money. The profiting from the avails of prostitution by a BRP owner, a pimp and or organized crime is illegal. What part of this law do you have the right to sanction and legitimize just because you are a city councilor?

This does follow your Guide lines in section 2 of a law designed for the regulation of legal, sanctioned and law abiding business owners. This business is known to be a heaven for trafficking women

According to a CTV report human trafficking is considered by the charges are laid related to sexual exploitation.

Even though the act of human trafficking, the kidnapping and transportation of persons, is illegal, it is not, in and of itself, the profitable portion of this business. The financial profits come from the exploitation of the trafficked persons. And these people are exploited through illegal labor practices, in restaurants, nail parlours, farms, construction sites and through prostitution in BRP. And just in case you through Saskatchewan and Regina in particular is exempt from that illegal and exploitive activity take off your blinders and open your minds to the reality of the underworld. Organized crime, pimps and BRP owners are hoping these are sanitized,

DIVISION 4 Enforcement of City Law Inspection 324(1) If this Act or a bylaw authorizes or requires anything to be inspected, remedied, enforced or done by a city, a designated officer may, after making reasonable efforts to notify the owner or occupier of any land or building to be entered to carry out the inspection: (a) enter that land or building at any reasonable time and carry out the inspection authorized or required by the enactment or bylaw; (b) request anything be produced to assist in the inspection; and (c) make copies of anything related to the inspection. (2) The designated officer shall display or produce on request identification showing that he or she is authorized to make the entry. (3) When entering any land or building pursuant to this section, the designated officer may: (a) enter with any equipment, machinery, apparatus, vehicle or materials that the designated officer considers necessary for the purpose of the entry; and (b) take any person who or thing that the designated officer considers necessary to assist him or her to fulfil the purpose of the entry. (4) In an emergency or in extraordinary circumstances the designated officer need not make reasonable efforts to notify the owner or occupant

and need not enter at a reasonable hour, and may do the things mentioned in clauses (1)(a) and (c) without the consent of the owner or occupant.

Good morning. My name is Devon Hill, and I am with Freedom Catalyst Regina. I just wanted to start off by saying thank you for continuing to allow for public input during this time of social distancing, and by providing the means through teleconference to do so – it is very much appreciated.

This morning I would like to address one topic in detail related to Administration's recommendations. I have further thoughts on the other details mentioned in the report, but I will address those another day due to time restrictions. But I feel like this one topic is important to discuss all on its own. That is this – the recommendation that BRP owners/operators be licensed, and not the workers.

I have said this before, but I would like to reiterate again – this is illegal. What is being recommended here is licensing, and therefore sanctioning, something that is against the law. There are federal laws (called PCEPA) in place that state it is illegal for an owner to be involved in a body rub parlour. For example, there is a good fact sheet put out by the Government of Canada Department of Justice for PCEPA. says the following: it is "illegal to earn money by owning, managing or working for a commercial enterprise, such as a strip club, massage parlour or escort agency, knowing that sexual services are purchased there."

There is a recommendation in the report also saying that all advertisements should have the license number listed to show they are in compliance with the bylaw. This is also illegal (when done in the context of an owner). For example, the same fact sheet says the following:

PCEPA, "criminalizes advertising the sale of sexual services... for the first time in Canadian criminal law. This new offence applies to individuals who advertise the sale of another person's sexual services, including in print media, on websites or in locations that offer sexual services for sale, such as erotic massage parlours or strip clubs. The offence also applies to publishers or website administrators, if they know that the advertisement exists and that it is in fact for the sale of sexual services."

As much as some people may not like or agree with these laws, they are indeed the laws in place in our country, and they should be both honoured and enforced. During past discussions, it was mentioned that through any bylaws that are enacted, it can't be seen as trying to change the criminal code of Canada. This was said in the context of why they believe they couldn't ban body rub parlours. If that is the case, shouldn't that apply for this scenario too?

Some people may argue that if you don't license the owners, it will just promote non-compliance to the bylaw. But is that really the logical road we want to go down? Is it logical to sanction an illegal activity just because we're concerned that if we don't license it, they will then perform the illegal activity without our knowledge? What other

illegal activity would we ever give the same green light to in our society? There isn't any. This is the only illegal activity I know of in our country that is allowed to operate like this in other cities (and I readily admit other cities do it in their bylaws). Should Regina do the same? Or should we be leaders in our nation, and stop turning a blind eye to this, and not allow it.

There are very good reasons why it is illegal for owners to be involved in prostitution. It is based on the exploitative nature of what occurs, the possibility of human trafficking being involved, etc.

To look at it in another way, what if we had a licensing bylaw where the higher level drug traffickers had to apply to sell drugs out of a drug house. Would the benefit of knowing who these people are outweigh the fact that we as a City are condoning they come into our community and sell drugs? I would sure hope note.

My take is this – if licensing is used, licenses should not be given to any parlour where owners/operators are involved. There should also be a clear bylaw in place that if deception or falsehood is involved during the application in relation to owners, if it is found out, that would cause an immediate revoking of the license, and prevention of re-application for several years. For example, places like Saskatoon and Niagara Falls have bylaws that revoke a license if false information is provided. The one applying for the license should also be interviewed one on one with the police so that they can ask them questions to determine if other owners are involved. A document could also be created that would be required to be signed stating a declaration that owners are not involved.

This is a safety based thing. This protects the girls from the very purpose and reason why the federal government enacted this law in the first place. This is for the protection of the girls, to reduce human trafficking potential, and to do all we can as a City and a Police force to ensure we aren't playing any part in allowing the illegal exploitation of a person.

Thank you for allowing me to speak.

Bruce Ellergodt

Thank you for allowing me to speak my concerns regarding the proposed licensing of body rub parlour owners. My concerns are primarily around two issues:

1. The illegality of second parties profiting from sex work (in this case, the owners of these businesses)
2. The high likelihood that at least some, if not most, of the workers involved in these places have been lured or trafficked into them, may be kept there under threats and intimidation, are used and abused sexually, and otherwise treated poorly,

First, the illegality. I am sure you are aware that under the current law of Canada governing prostitution, it is illegal for anyone to advertise or profit from sexual services provided by others. In the case of body rub parlours, we know that they generally do provide sexual services (refer to articles below), and I believe that it is reasonable and logical to assume that unless they are owned by the workers themselves, the owners would be profiting from their services.

Yet you are considering licensing these very owners, in effect legitimizing this illegal activity. I ask you, How can you possibly legitimize something that is illegal? As city councilors, you must respect and uphold the laws of the land. And you must not make it more difficult, if not impossible, for our police to uphold them. How will they be able to arrest, or the courts to convict, these owners, these pimps - once they have licenses from the city to run these businesses?

2. I am very concerned about the safety and well-being of the women working in these establishments. I encourage you to read the first article listed at the end of my presentation, published by the CBC in April of 2018, entitled "Sex Trafficking is rampant in city-licensed spas, massage parlours". You'll read that Cassandra Diamond was lured as a teenager into a Toronto massage parlour and lived in fear there for the next ten years, forced to provide sexual services for a dozen men each night, routinely enduring acts that were degrading and violent. Her trafficker kept her money and cut her off from family and friends. Although Toronto body rub parlors are licensed, she says there are no mechanisms in place to ensure the safety of the women involved.

Cassandra is now among those calling for more support for victims in Toronto and questioning why the city is in the business of licensing spas and massage parlors where sex trafficking is proliferating right under bylaw officers' noses. "It felt like everybody knew what was going on, and it was okay," Diamond said. "It was socially sanctioned — it made you think it was safer — but it wasn't. Not at all."

Of the 200 trafficking victims recovered by Toronto Police since 2014, they say many are trafficked within city licensed establishments. And the city is trying to figure out what to do about it. Whatever the city decides, Diamond worries that licensing illicit businesses will allow sex trafficking to continue in a way that appears "sanctioned" by the city itself. "I remember thinking, 'These people know about what's going on because they're licensing this,'" she said. "I

perceived that [Municipal Licensing and Standards] understood that some guy was hitting me, spitting on me, punching and kicking and slapping. It's like they knew that these requests were being made and were saying, 'It's okay.'"

Friends, I plead with you, for the sake of these young women and girls, please do not license these owners. In effect, you would be sanctioning their illegal and abusive activities. Thank you.
Marilyn Phillips

<https://www.cbc.ca/news/canada/toronto/sex-trafficking-licensed-spas-toronto-1.4612213>

(Toronto trafficking survivor's story)

<https://globalnews.ca/news/999006/police-raid-three-massage-parlours-linked-to-human-trafficking/amp/> (Montreal)

<https://globalnews.ca/news/920744/human-trafficking-arrests-made-in-quebec-and-ontario/>

(Toronto, Cornwall)

<https://www.dressember.org/blog/imbandhowtospotit> (American article re: IMB's or Illicit Massage Businesses)

Regina City Council Meeting – August 26, 2020

My name is Ed Smith and I am speaking as a concerned citizen of Regina.

By the narrowest of margins, our city council decided to allow body rub parlours to operate in Regina. Now we are faced with the daunting task of trying to control how they operate to reduce harm to workers, to clients and to the neighbourhoods of our city.

To begin, let's be clear that body rub parlours provide sexual services to clients and the sexual services are provided by individuals who work in these establishments. The majority of the workers are young women and the clients are almost exclusively men.

I have spoken to Council in the past and shared about the death of our 18 year old daughter who was murdered in 1990 while being sex trafficked across Western Canada. Because of this tragedy that happened to our family, my wife and I knew we had to become proactive in the fight to stop the sexual exploitation of vulnerable individuals.

In 2014 we were invited to appear before both the House of Commons and the Senate Standing Committees of Legal and Constitutional Affairs, to speak in support of Bill C-36. It was passed by both Houses and given Royal Assent and became law in Canada on November 6, 2014.

In December of 2015 I wrote a letter to the Minister of Justice and Attorney General of Canada asking that this new law, the *Protection of Communities and Exploited Persons Act*, be vigorously enforced.

Shortly after sending my letter to Ottawa, I received a reply from The Honourable Jody Wilson-Raybould, Minister of Justice and Attorney General of Canada, and I quote from that letter:

“As you know, the *Protection of Communities and Exploited Persons Act* criminalizes purchasing sexual services, receiving a material benefit from the prostitution of others, advertising the sale of others’ sexual services and procuring.”

The proposed new bylaws obviously recognize that the workers in the body rub parlours are not the owners, as the proposal is to license workers and owners separately and charge them different licensing fees. If there were a body rub parlour where the worker providing the sexual service was also the owner, would that individual be charged both fees?

Our City Council is being asked to give approval for the operation of body rub parlours which are selling sexual services, but are not owned by the individuals providing those services. This is clearly illegal as stated in the *Protection of Communities and Exploited*

Persons Act. The owners of the body rub parlours will clearly be living off the avails of another person's sexual services. The City of Regina is putting itself in a position of approving an illegal activity by licensing owners who are in direct contravention of the law because they are receiving a material benefit from the sexual services provided by another individual. They are also violating the law by advertising another person's sexual services.

As a City Council, are you going to choose to obey the law, or are you going to somehow try and say that the laws of Canada don't apply to us in this case? This law was passed to protect vulnerable people from those who would take advantage of them. I want Regina City Council choose to abide by the laws of Canada.

August 20, 2020

Good Afternoon Mayor Fougere and to our City Council Members,

As a member of the general public I would like to state where I stand regarding the City of Regina Administrations recommendation to allow licensure of body rub establishment owners and pimps. I am presenting to you today because I am strongly against the licensing of the illegal body rub establishments in our city.

When I started receiving information about our city representatives supporting body rub establishments I was in disbelief as to what our city is imposing regarding licensing illegal activity with body rub establishments. As a Regina citizen I could no longer sit back and not have my voice heard and felt compelled to speak today to be the voice of the exploited workers of the illegal body rub establishments.

Are you aware that innocent women (mostly Asian and some European) are being deceived and lured to Canada with the promise of honourable employment to work in these body rub establishments? I do not agree that our city should be supporting the licensure of such illegal activity. Allowing body rub parlour owners and pimps to license their establishments is not only morally wrong, but it is illegal in our country. This also creates an invitation for human trafficking in our city. Do you believe that this is right in this day and age to be supporting such a thing in a country where we boast of our progression and freedom? It is very disturbing that our city would support these establishments by permitting pimps and owners to license their operations when there is NO other place in Canada that allows licensure of illegal activity.

I also do not agree that our Regina City Administration is recommending that these body rub establishments should oversee themselves. This means that the owners would ensure that the workers meet standards and the city would not be involved. This makes no sense and should not be allowed as this puts the already exploited workers at an even greater risk of being controlled against their will by the owners/pimps.

Bill C 36 The Protection of Communities and Exploited Persons Act was established in 2014. This law was made to protect the dignity and equality of all Canadians by denouncing and prohibiting the purchase of sexual services, the exploitation for the prostitution of others and the development of economic interests in the sexual exploitation of others, the institutionalization of prostitution through commercial enterprises such as strip clubs, massage parlours and escort agencies that offer sexual services for sale.

Owners/pimps should not be allowed to be licensed because that would mean that our city is standing behind supporting illegal activity. Once these body rub owners and operators are licensed by our city, it is unlikely that they would or could be arrested and charged for their exploitive illegal role with pimping.

Another question that comes to my mind is why the police are required to give 24 hours' notice to the body rub establishments prior to them being allowed to go in to inspect the establishments? This will allow ample time for the owners and pimps to hide all criminal and human trafficking evidence.

Thank you.

On behalf of my family and I who are concerned citizens of Regina, I am strongly opposing the sanctioning of licensing for owners and pimps of body rub establishments. It is my hope that our city councillors will really think this through prior to making their vote on August 26, 2020.

We need to establish bylaws in our city that prevent licensing owners and pimps, that reduce risks for the sexually exploited and that criminalize the perpetrators who are engaging in this illegal activity.

I would like to conclude by asking each and every one of you who will be voting on this date for or against pimps and owners being permitted to license body rub establishment:

If this was your family member (your daughter, your son, your granddaughter/grandson, your niece, your sister} working in these establishments would you be in agreement to licensing the owners and pimps and to permitting them to operate in our city?

Angie Ivey

Good afternoon. My name is Devon Hill, and I am with Freedom Catalyst Regina.

This afternoon I would like to address 4 topics.

1. Temporary Work Permits

I would like to talk about these federal documents that come from Immigration Refugees and Citizenship of Canada. The federal government has mandated that the following statement be included on all open and closed temporary work permits:

“Not valid for employment in businesses related to the sex trade such as strip clubs, massage parlours, and escort services.”

(See: <https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operational-bulletins-manuals/temporary-residents/foreign-workers/protecting-workers-abuse-exploitation.html>)

I have submitted a copy of this document as an Appendix (but with personal information removed) so you can see it in person.

The charge for violating this can be a fine of up to \$50,000 or a prison term for up to 2 years.

The federal government has mandated this due to the major problem of human trafficking and sexual exploitation associated with bringing in foreign workers. I would also like to remind us all that 19 of the 20 body rub establishments that I know of in Regina advertise exclusively or mostly Asian (and sometimes European) workers.

I wanted to determine if reviewing work permits is a part of the licensing process in other cities. Because if it is, then all people coming into Canada on temporary work permits should never be allowed a license to work in a body rub establishment.

The Regina Administration report mentions that Toronto, Windsor, Calgary, Edmonton, Saskatoon, and Vaughn all have requirements that the worker is “legally able to work in Canada”. I looked up their individual bylaws to see what they specified. Here is what I found:

Calgary, Windsor, and Edmonton – I could not find anything that specified this requirement

Saskatoon – requires proof of applicant’s Canadian citizenship or residency status

Vaughn – requires proof of eligibility to gain employment in Canada.

Toronto – I didn’t review the whole bylaw, but a work permit is one document to simply confirm the person’s identity (but other non-work permit documents are also an option)

So while it's possible some of those cities look at the work permits, and reject the license application if the person is not a permanent resident, it is unclear, and there is a strong possibility that they don't follow this rule.

However, the federal government has mandated this. The municipal government and City Police need to follow this. This temporary work permit check needs to be a critical piece that is added to the bylaws. Please add this as a requirement, and not just the unclear wording in the report of checking the "legal eligibility to work in Canada".

2. Taking Fingerprints

In relation to these temporary work permits, my understanding is that they fingerprint all individuals that receive the permits (<https://www.canada.ca/en/immigration-refugees-citizenship/campaigns/biometrics/facts.html>). So this is standard protocol.

From discussions with experienced people in other cities, one big concern is that fake documents are used in body rub applications. Or there are things like the fake diploma mills to try and say they are registered massage therapists, but in fact they are fake documents.

This same concern can apply for the work permits. If traffickers know this restriction exists, and the women might get denied a license, they will create fake documents to try and get around it. To nip this in the bud, and provide a much stronger safety control for the workers, I think it is critical to implement the need for fingerprinting during any licensing process. That way the same prints can be cross referenced with the federal database of work permits, and it will remove the risk or possibility of being able to create fake permanent residency documents.

California already does this during all body rub license applications (see 5.36.150 (K) and (M) in Chula Vista's licensing bylaws as one example: <https://chulavista.municipal.codes/CVMC/5.36.150>). In fact many places in California have some of the most robust and comprehensive licensing bylaws that I've ever read. I talked to a police officer in California (Chula Vista county) recently and asked him about the fingerprinting. He said all counties and cities in California take fingerprints during the license application. He said the purpose is to verify identity, reduce risk of deception, and also hold people accountable. Fingerprinting can also be used in risky industries, to better be able to identify victims of homicide or violence.

Therefore I'd like to recommend that fingerprinting be implemented as part of the application process, as well as cross referencing those fingerprints with the fingerprints obtained federally for work permits. This is already standard practice in places like California, and I believe we would do well to follow suit. This is for the safety of all workers, to reduce criminal identity cover-ups and document fraud.

3. Licensing Bylaw Additional Recommendations

Based on past speeches, many know that I am not a fan of licensing bylaws. There can be some pros associated with them, but I believe the cons far outweigh them. However, over several years I have done dozens of hours of research on different licensing bylaws across Canada, and I have put together a document on what I personally consider to be the best ones. Since this is what Council previously voted for, I would like to recommend additional bylaws be considered for inclusion that are not yet included in Administration's report. I don't have time to read them, but they are included in the Appendix.

4. Licensing illegal owners

If an owner is involved in a body rub establishment, it is illegal based on federal law. Please do not license illegal owners. If an owner is involved, that should be immediate grounds for rejecting any license. Also it is super critical to put something in place that if falsehood or lies are used in any of the application process (such as stating owners are not involved, but that is found out to be false), that the license is revoked, and it should not be able to be applied again for several years.

Thank you.

Devon Hill

**Appendix A – Immigration Refugees and Citizenship Canada
Document**



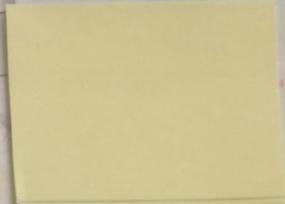
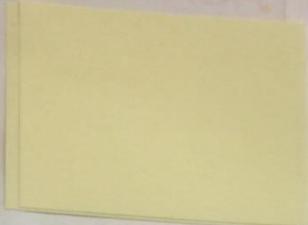
Immigration, Refugees and
Citizenship Canada

Immigration, Réfugiés et
Citoyenneté Canada



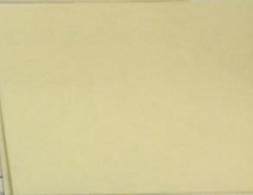
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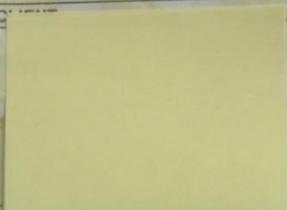
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UCI/IUC:



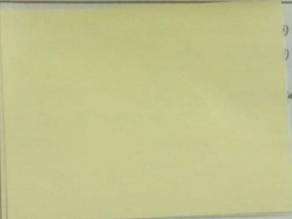
CLIENT INFORMATION/INFORMATION DU CLIENT STUDY PERMIT/PERMIS D'ÉTUDES

Family Name/Nom de Famille:
Given Name(s)/Prénom(s):
Date of Birth/Date de naissance:
Sex/Sexe:
Country of Birth/Pays de naissance:
Country of Citizenship/Citoyen de:
Travel Doc No./N° du document de voyage:



ADDITIONAL INFORMATION/INFORMATION SUPPLÉMENTAIRE

Date Issued/Déjà délivré le:
Expiry Date/Date d'expiration:
Case Type/Genre de cas:
Institution Name/Nom de l'institution:
Field of Study/Domaine d'études:
In Force From/En vigueur le:



Conditions:

1. MUST LEAVE CANADA BY 2020/07/31
2. NOT VALID FOR EMPLOYMENT IN BUSINESSES RELATED TO THE SEX TRADE SUCH AS STRIP CLUBS, MASSAGE PARLOURS OR ESCORT SERVICES.
3. MAY ACCEPT EMPLOYMENT ON OR OFF CAMPUS IF MEETING ELIGIBILITY CRITERIA AS PER R186(F), (V) OR (W). MUST CEASE WORKING IF NO LONGER MEETING THESE CRITERIA.

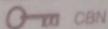
Remarks/Observations:

THIS DOES NOT AUTHORIZE RE-ENTRY/CECI N'AUTORISE PAS LA RÉ-ENTRÉE

THIS FORM HAS BEEN ESTABLISHED BY THE MINISTER OF IMMIGRATION, REFUGEES AND CITIZENSHIP - THIS DOCUMENT IS THE PROPERTY OF THE GOVERNMENT OF CANADA
FORMULAIRE ÉTABLI PAR LE MINISTRE DE L'IMMIGRATION, RÉFUGIÉS ET CITOYENNETÉ - LE PRÉSENT DOCUMENT EST LA PROPRIÉTÉ DU GOUVERNEMENT DU CANADA

Canada

IMM 1442B (06-2012)



Appendix B – Recommended Additional Licensing Bylaws

Based on research performed on already implemented bylaws across Canada, the following are bylaw suggestions for body rub establishments that are not currently included in the City Administration report.

For reference purposes, specific cities within North America where these bylaws are already implemented have been included. **It should be noted the inclusion of these cities after each individual bylaw does not indicate these are the only ones that incorporate that bylaw, but are simply included as examples.** All reference cities are Canadian with the exception of one (Chula Vista, CA – which is also included due to many cities/counties in California that have very well written and insightful bylaws).

The bylaws have been broken down into three categories: General, License and Operations.

General

- Bylaw wording includes body rub establishments, but also holistic health services (Toronto, Chula Vista)
 - Businesses that do not fall under the above categories, are exempt. However, under the discretion of the police or city bylaw enforcers, if a business reasonably suggests that similar services are being offered (based on advertisements placed in adult entertainment sections, sexually suggestive wording, pictures or description of workers in advertisements/websites, online reviews of sexual services offered, community complaints, business inspections, etc.) licensing and operation under these bylaws can be required.
 - This can be used to prevent body rub parlours from changing the business to some other form (spas, tanning salons, etc.) but still provide the same services as before.

License

- During the license application, along with other necessary information, the following would be required:
 - Email address, phone numbers and webpages used in advertisements (Edmonton)
 - Previous addresses and dates for the last 5 years (Chula Vista)
 - Employment history for the last 5 years (Chula Vista)

- A business license history: whether any license was suspended or denied in Regina or other city, including the reason for, and a description of the business (Chula Vista)
- Applicant fingerprints (Chula Vista)
- If rented/leased, written and signed consent from building owner providing consent the building can be used for a body rub parlour, and also specifying the knowledge that this business activity could possibly be at high risk and under inspection by the police/city (Niagara Falls, Hamilton – written consent that the building can be used for this purpose only)
- Signed document from doctor indicating the applicant is free from communicable diseases and fit (Vaughan, Pickering, Windsor, Chula Vista)
- An approved safety plan for all workers (Edmonton)
- Photograph (Windsor)
- Temporary work permits (if applicable) (Vaughan)
- Building lease papers or property ownership papers (Vaughan)
- Any false statements provided (or reasonable grounds to believe so) in the license application will cause the application to be rejected/revoked (Saskatoon, Niagara Falls, Windsor)
- License can be rejected/revoked if there is reasonable grounds for belief that the business will not be carried on in accordance with the law and with integrity and honesty (Niagara Falls, Windsor)
- License can be rejected/revoked if there is reasonable grounds for belief that the business would infringe the rights, or endanger the health or safety of, members of the public (Windsor)
- Applicant cannot re-apply for license for 1 year if rejected or revoked (or 3 months after denial was finalized if the issue has been corrected) (Saskatoon)
- If the business is a corporation, list of all officers, directors and shareholders and the address of their ordinary residence, and a declaration that the persons named are the only shareholders of the corporation (many)
- The issued license can be suspended for up to 3 months at the court's discretion for any offence (Saskatoon)
- Any issued license will have a photo (Saskatoon, Chula Vista)
- License can be denied if there is reasonable grounds to believe there is health

Operation

- Notification must be provided to city officials within 48 hours when a new worker is employed or when someone is no longer employed (Kelowna, Maple Ridge, Hamilton)
- All rooms used for patron services must have a transparent or translucent window (with specified dimensions) (Burnaby, Coquitlam, Pickering)
 - Purpose: to prevent anyone from making the claim they are unaware that the workers are performing services that contravene the bylaws during an inspection
- Inspection by proper law enforcement or city inspectors should be allowed without delay or hindrance - refusal to provide this inspection results in a revoking of the license (Saskatoon)
- A record of the date/time/cost/nature of all services performed, patron name/address/phone number (photo ID must be shown and type of ID that is shown recorded), and worker's name must be kept for period of ___ years/months and open for inspection by any authorized inspectors (Coquitlam, Calgary, Vaughan, Chula Vista)
 - Note: if the ID is simply just shown to the worker, but not recorded, the likelihood of the worker remembering this information to tell the police (after an abusive situation) is greatly diminished
- A list of services available and the cost associated with them should be posted in an open public place onsite and with the licensing department - no services other than those posted are allowed (Chula Vista, Toronto)
- Advertising can't reasonably suggest anything other than a body rub (or the list of services provided) is available (Calgary, Winnipeg)
- No onsite signs should display any nudity, sexually suggestive or implied text, pictures, or descriptions of employees/services (Burnaby, Maple Ridge)
- No advertisement (print or online) should display any nudity, sexually suggestive or implied text, pictures, or descriptions of employees/services (Kamloops)
- No practitioner, operator, or owner (and no person should permit another person) should be present in any area with another person unless their genitals and other sexually defined areas are fully covered with an opaque covering. Appropriate attire (deemed proper for a professional establishment) is required to be worn at all times when in the same area as a patron. (Toronto, Pickering, Surry, Calgary, Winnipeg, Vaughan, Windsor, Chula Vista).

- No person shall permit any other person to massage or intentionally touch the genitals or other sexually defined areas of another person. No sexual activity is allowed between two or more persons in the same area. (Chula Vista, Maple Ridge, Pickering, Niagara Falls)
- Restrictions specifying patrons are not allowed to touch employees (Calgary)
- All rooms/areas used for patron services may not contain a mattress, futon, bed, couch, chair or other item of furniture that could reasonably be used as a bed (Maple Ridge, Coquitlam, Niagara Falls, Vaughan, Windsor)
- No part of the premises should be used as a dwelling or for sleeping (Hamilton, Niagara Falls, Pickering, Calgary, Vaughan, Windsor)
- Unlawful for any person to engage in the business of massage/holistic health in any hotel room, motel room, guesthouse or other place of public accommodation (Chula Vista)
 - Exemptions are granted for places like hospitals, senior care facilities, etc.
- Cameras and video cameras are not allowed to be used onsite with the exception for security purposes and by bylaw officers/inspectors and police (Windsor, Vaughan)
- No false or misleading information is allowed on any record that is required to be kept (Calgary)
- Any advertising is proof that body rub is occurring in an establishment. Also one transaction of body rub is also proof. (Calgary)

The report tabled on August 5, 2020 advocates for licensing of establishments, including workers and owners, and professes to be concerned about the safety of workers, communities and "patrons". How is it that we, as a City, are moving to regulate activity that is illegal in Canada: "owners" who profit from prostitution and "patrons" who procure their services? The report and lengthy regulations is reminiscent of Canada's gun legislation which regulates law-abiding gun owners, not criminals who care nothing about regulations. Will these regulations make it easier to prosecute the sex-traffickers? Will it actually protect the workers? If Council cannot say yes to both of those questions, it is, at best, wasting tax-payer money and, at worst, causing harm. We must be about doing actual, verifiable, good, and not just the pretence of it.

Thank you.

Carla Taylor-Brown

My name is Pam Shaheen, Citizen and Taxpayer of the City of Regina.

I would like to start by reading a portion of the code of conduct for Regina city officials.

The Cities Act Bylaw No. 2017-4 5

13(2) A member shall strive, by focussing on issues important to the community and demonstrating leadership, to build and inspire the public's trust and confidence in local government.

I would like to have each of the council members think of whom they are representing. I do understand that the Police Chief is pushing for this but ITS ILLEGAL and therefore you should not encourage illegal activity for police to do their job. As a citizen of Regina, I do not feel this should be a priority for our community. These are changing times during a pandemic, businesses and citizens are all adjusting and so should city council. We have limited funds to service the citizens in Regina. Is this really in the best way to spend taxpayers' dollars for Regina to move forward with licencing illegal businesses?

Information published by CTV Aug 5th.

City council discussions.

"There are concerns the workers' names won't be protected from the public if they are licenced.

City council would need to lobby the provincial government to change privacy laws in order to protect the workers' names."

City council voted to licence workers.

Now city council is going to lobby the Government to change privacy laws, so you are able to licence an illegal business in Regina. How many Rabbit holes does city council want to go down?

There have been hours of meetings and discussions and there will be many more spent on the topic of figuring out how to best serve a few citizens of Regina that want to operate and work at an illegal business in our city?

I would like to bring to the attention of city council, that this is not your jurisdiction. Laws of Canada are in place. Agencies and community groups are in place to deal with your goal of helping Sex Trade Workers and Human Trafficking. I do not believe the majority of Regina citizens would be in favor of the time and taxpayers' dollars that is being spent on this issue.

Definition of a Pimp

a man (woman) who controls prostitutes and arranges clients for them, taking part of their earnings in return.

Please do not let Regina be a city that legitimises people profiting and exploiting their staff to give patrons intimate body rubs.

I am against licencing owners of body rub parlors in Regina.

Honorable Mayor Fougere and esteemed City Councillors --

Thank you for the opportunity to address you today regarding the important issue of licensing bylaws for Body Rub establishments in our city.

I have been following this issue since it arose and the city held meetings to obtain the views of the citizens of Regina. Participating in the round table discussions, I heard the frustration of many concerning these establishments and various ideas of how to handle them.

I was disappointed to hear that city council has voted to allow body rub establishments in Regina, albeit moving them away from primary streets to the industrial area. It is no secret that illegal activity- the purchase of sexual services--occurs in most body rub establishments. We can stick our head in the sand or try to ignore it, but the longer we allow them to continue, the more we support this activity and continue to put in danger vulnerable, trapped sex workers. We have an obligation to them as well as to uphold the laws of Canada specifically The Protection of Communities and Exploited Persons Act (PCEPA).

It has come to my attention that council will be voting today on licensing bylaws and in particular licensing the owners/operators of body rub establishments. I believe licensing owners would be a grave error for our city as well as contradictory to PCEPA. Regardless of our personal opinions on this Act, by Canadian law it is STILL illegal to purchase sexual services and for others to advertise and/or profit from the sale of them. By licensing owners/operators of body rub establishments it appears that we are actually sanctioning this and making it next to impossible for them to be charged with pimping or profiting from the sale of sexual services. I think council should be seeking to uphold and adhere to the law in all respects, whether it be federal, provincial or municipal.

I do not profess to be an expert in this area, but I do have some personal experience with it and think we can do better than what is currently being proposed. I have heard the following suggestions being proposed and I am in agreement with them.

- Workers who are licensed should verify in their application process that owners are not involved. If there is evidence that their statement is untrue, consequences such as automatic revoking of the license and a ban on re-applying for multiple years would result. It is critical for the safety of the workers to add proper checks and balances to protect against possible human trafficking situations from occurring.
- Law enforcement officers should be able to perform their duties without having to give notice before attending these establishments for checkups. Advance notice allows an opportunity for evidence of human trafficking or owner/pimp involvement to

be removed and in essence, ties the hands of the police in enforcing the law and protecting this vulnerable sector.

In summary, I am asking that you do not allow owners to be licensed, that workers must assert in their application that owners are not involved and that our law enforcement officers be able to ensure that the law is being upheld without having to provide advance notice.

Human trafficking is a very current, real issue and isn't relegated only to larger centres. It is happening in our fair city. We can do something about it. Let's do our part in helping to end it and making our city not only a safe place but a great place to work and to live....for all its citizens.

Thank you for your consideration.

Carla Johnson



Regina, SK

Honourable Mayor Fougere and Council members

Harm reduction

The reason cited by the city of Regina administration and council to license body rub owners and operators, was to reduce the incidence of harms inflicted upon the sex trade workers within.

This sounds to me like you may not trust the owners/operators to protect the workers to the best of their ability of their own volition.

So I wonder, how then how these same owners/operators are being recommended by the same administration to now be placed in trust of overseeing themselves and their workers to reduce harms?

Past sex trade workers in body rub establishments report that their panic buttons were never answered. Are we to believe that just by putting the requirement to respond and protect in writing, this will now change?

Oversight

What oversight is in place to ensure that if licensing was approved, requirements will be followed? Administration is recommending that owners oversee themselves.

Discovery and Enforcement

All the best written licensing requirements are of no effect if they cannot be discovered or enforced.

When the Regina Fire Department shows up to do an inspection, they are not required to give advanced notice, in recognition that transgressions would be hidden in advance.

Regina City Police are required to attend and inspect with advanced notice only.

Should human trafficking or any other crime occur at any time, a notified owner would have ample time to ensure that all evidence is removed in advance of inspection; leaving no hope of rescuing those assaulted or trapped.

Since almost all human rights violations and harms occur behind closed doors, I wonder how assaults and human trafficking would be discovered?

Documentation

Leaving all present and future owners/operators in charge of gathering and maintaining all the workers documentation suggests that you have put your full weight of trust that none would or could ever obtain false ID documentation as has been done in throughout other Canadian jurisdictions.

According to the London Abused Women's center in Ontario, fake ID provided to under age sex trade workers is not uncommon. <https://www.lawc.on.ca/wp-content/uploads/2018/04/Youth-Package-Phoenix.pdf>

Licensing

While PCEPA legalized the sale of sexual services, it still remains illegal to purchase this service or profit from the proceeds of another's sex trade work.

I wonder how licensing of owners/operators can occur without legal recourse?

Once licensed, would it not be impossible for police to charge and/or prosecute owners who are profiting from the sale of another's sexual services? I believe it would grant them immunity and a sanctuary for human trafficking in our city.

Sex trade workers themselves are the only ones who could legally be licensed according to PCEPA and IRPA Section 118, 2.3.

I believe the only thing more dangerous than licensing the sex trade workers, is licensing the owners/operators only.

Communities that have done this have become human trafficking hot spots. The owners are sanctioned and the workers are documented only within the confines of the owners.

I request that you license neither owners nor workers.

A woman's voice has recently been heard repeatedly screaming "Please stop!" On the south east corner bungalow corner of 12th Ave and Broder St that gets a lot of traffic and action.

In conclusion

1. I ask that you do not license the owners/operators without licensing the workers which would be the most dangerous and invite human trafficking.
But more importantly, I ask that you do not license anyone associated with the sex trade.

2. I respectfully request that you do not leave the Body rub establishment owners/operators to oversee themselves.
 3. I also ask that you untie the hands of law enforcement by;
 - a. Making all necessary amendments that ensure that no one purchasing or profiting from the sex-trade work of another is sanctioned or protected.
-
1.
 - b. No one associated with a body rub establishment is notified in advance as to when police will be attending. There clearly needs to be an element of surprise if human trafficking and harms are ever to be discovered.

Jane Gattinger



Mastery Massage Inc.
Service Provider & Consultant

August 20, 2020

Dear Council Members,

My name is Christy Kasur. I have been a practicing massage therapist for 23 years in Alberta. I'm a member and volunteer for the Natural Health Practitioners of Canada Association. I have been qualified as an expert witness in the Alberta Provincial Courts as a subject matter expert on the massage health profession in Alberta.

I am recognized as a stakeholder on the Alberta Provincial Human Trafficking Task Force.

I am also the President of the Transitional Council for the College of Massage Therapists of Alberta, who represents 6,000 health care professionals trained and licensed as Massage Therapists, working with the Alberta Government towards regulating the massage profession.

I am speaking to you today as a subject matter expert about two points. First, my concern about the City of Regina developing licensing and zoning practices that are not consistent with Federal law with respect to Body Rub Establishments. And secondly, by approving licensing Body Rub Establishments and the association with massage increases the harm of sexual violence to legitimate massage therapists, harms the integrity of the massage profession and increases the public risk.

It is important to understand the current laws and how they came to be. The *Bedford* case is often referred to in such debates however, it does not state the law. Bill C-36, the *Protection of Communities and Exploited Persons Act* states

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the law. The Supreme Court of Canada gave Parliament one year to respond to its findings in *Bedford*. Bill C-36 came into force on December 6, 2014.

Bill C-36 is the Canadian version of the Nordic Model based on Canadian law; *Canadian Charter of Rights and Freedoms* and the *Criminal Code*. Federal law supersedes Provincial law and by extension municipal law.

Bill C-36 seeks to decrease and prohibit the demand for prostitution, the exploitation by third parties, and the institutionalization of prostitution through commercial enterprises such as strip clubs, massage parlours and escort agencies in which prostitution takes place. Prostitution is defined as the exchange of sexual services for consideration or payment.

A “sexual service” is a service that is sexual in nature and whose purpose is to sexually gratify the person who receives it. “Obtaining a sexual service for consideration” involves an agreement for a specific sexual service in return for payment or another kind of consideration, including drugs or alcohol. (please see the Justice Canada publications)

Activities that have been found to constitute a sexual service or act of prostitution if provided in return for some form of consideration includes: sexual intercourse; masturbation of a client in the context of a massage parlour, whether or not the client climaxes; oral sex; lap-dancing, which involves sitting in a person’s lap and simulating sexual intercourse; and sado-masochistic activities, provided that the acts can be considered to be sexually stimulating or gratifying. (please see the Justice Canada publications)



A transaction in exchange of sexual services for consideration or payment is illegal. Purchasing sexual services is an offence which makes the whole transaction illegal. If the transaction is illegal, then any businesses based on illegal transactions is considered an illegal business. And providing licenses to illegal businesses is a violation of the Federal statute.

Bill C-36 research does show that countries who have decriminalized or legalized prostitution tend to have larger sex industries. Two empirical studies have shown that decriminalization and legalization are **linked to higher rates of human trafficking** for sexual exploitation. The Canadian Parliament seeks to keep demand for sexual services low and as a small as possible.

Speaking as massage health professional and from personal experience, I am concerned about municipalities compromising the integrity of the massage profession by licensing illegal businesses and purporting that anyone who can be a masseuse is a masseuse. Licensing Body Rub Establishments associates the sex trade with the massage profession and increases the risk of harm to legitimate massage therapists. Municipalities are coating a veneer of legitimacy on people involved in illegal activity and as a result contributes to public confusion which increases harm of sexual violence to legitimate massage professionals.

The illicit massage businesses and Body Rub Establishments create confusion in the public's eyes between massage health professionals and illicit massage service providers. As a result, this can increase the risk of sexual violence to practicing massage therapists.

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Everyone is entitled to their own opinion how to protect people in the sex trade, however everyone in Canada has to abide by criminal law (Bill C-36) when it came into force in 2014.

My question to the City of Regina is do you intend to develop zoning and licensing practices with respect to businesses that are effectively illegal to be consistent with the Federal criminal law that clearly all of the Department of Justice publications shows is not legal?

Thank you,

Christy Kasur
Subject Matter Expert Perspective

I have presented twice the increase of sexually transmitted diseases in our province in which the city of Regina is located. I recently read how the provincial gov't is concerned with the rise of sexually transmitted diseases of which body rub parlors are a site of transmission. This is a degradation of our society affecting marriages and children.

It was also brought to the attention of city council how body rub parlors bring organized crime to the city, as well as the police are even hampered in their ability to police these establishments.

City council wants to license pimps which is against Canada Prostitution Laws, clearly illegal for owners/pimps to be involved. Why does city council want to sanction illegal activity?

The strong voice by the citizens of Regina last year seems to have been totally disregarded. I know that I am voice for many. Why do you as city council want to promote such filth?

I would ask you to reconsider your stance on body rub parlors.

Regards,
Marilyn Degelman

Date: August 20, 2020

To: City Council re: Body Rub Establishment Licensing

The Protection of Communities and Exploited Persons Act (PCEPA) has made it legal to sell intimate body massage to protect the vulnerable trapped young workers from further injury from our justice system.

However, PCEPA still makes it illegal to purchase these services (johns), for others to profit from the sale of it (owners/pimps), or advertise (by owners/pimps only).

- You have voted to allow body rub establishments in our Regina industrial areas. I am in opposition to allowing them in Regina.
- You will be voting on licensing the owners or operators (pimps) as recommended by Regina City Administration. This is still illegal in Canada as clearly outlined in PCEPA. I am in opposition to licensing them. We cannot and should not license illegal activity in our City. Illegal activity should be enforced to be stopped, not sanctioned through licensing.
- While the claim of those recommending licensing is that our street workers will be better protected; I disagree. Past workers of other licensed body rub establishments in Canada report, or are found, to being abused, neglected and trapped.¹ Imagine if it were your sister, daughter, niece or grandchild. These establishments are known to employ vulnerable Asian women; and not Regina street workers in most cases.
- If these owner/operators (pimps) are licensed, it will be nearly impossible to arrest and charge them for pimping, since that is what they would be licensed/sanctioned to do by our city officials.
- If workers are licensed, during the application process, there should be something enacted where if any deception or falsehood is used (e.g., stating owners are not involved, but they are found out to be involved), that would be cause for automatic revoking of the license and a ban on re-applying for multiple years. There needs to be proper documentation in place during the application that the workers can attest/sign that owners are not involved.
- In addition, please ensure that our police hands are not additionally tied by requiring them to give notice before attending these establishments for checkups, since this would allow all evidence of human trafficking or owner/pimp involvement to be removed in advance.

Please do not allow or license pimps/owners in our city.

Please put in the proper paperwork during the application process to ensure workers attest/sign that no owners are involved, and that licenses are revoked (and reapplication cannot occur for several years) if any false statements are made during the application. This is a critical requirement for the safety of the workers to add proper checks and balances to protect against possible human trafficking situations from occurring. Please allow police to do their job without hands tied by allowing them to check up on these body rub establishments unannounced (without having to book appointments in advance). Your citizens are counting on you. Thank you!

Respectfully submitted,
Andrew Waithe

Mayor Fougere and City Councillors,

I'm writing to pass along a letter (attached) from one of the body rub establishments regarding the motion on licensing that will be discussed at next week's Council meeting.

I will not be available to present this at the meeting, and they still wish to remain anonymous, but they've asked me to share it with you on their behalf.

The Heritage Community Association's position continues to be, that Council should be prioritizing the input of those who are most impacted by these decisions, which in this case is those working in body rub establishments. We hope you will consider their recommendations carefully.

Thank you,

Shayna Stock

Executive Director, Heritage Community Association

Existing spa owners have always supported Council passing BRE licensing. As long as the rules were reasonable and not overly burdensome. Most ladies have been thru the process in other cities.

However, much of the current discussion on details now seems pointless after the decision to force BRE's into Industrial Zones. There are literally NO suitable locations at present. And those that might be half suitable would require tens of thousands dollars in renovation costs and countless extra expenses. 3,000 square feet and a loading bay maybe suitable for some businesses but not a BRE. In addition, city administration agrees these zones are more risky to worker safety. So much more risky they want to mandate 2 employees present at all times, and force all guests to enter and leave only thru the front door. You are basically eliminating the small owner/operator shops and forcing them to work at "Super Spas". It is similar to killing small businesses and forcing the owners to work at Walmart.

Your decision on Zoning will literally force the businesses underground. A few BRE's may open but the vast majority of current owners will find it is just not worthwhile or cost prohibitive. The result is no business registrations, no licensing, no background checks, no educational programs. It will result in greater risk to operators and their guests. It will result in potentially more neighborhood disruption. "Out of sight, out of mind" is a solution to some challenges. But it is generally a poor one. And one that Council is encouraging by their decisions today and previously.

We request you reconsider your zoning decision, if not today, then at a future council meeting. It is the only thing that will make BRE licensing truly effective and achieve the original goals.

However if Council does decide to proceed as is, we ask that they consider the following 3 issues.

1) The proposed requirement for workers to get licensed seems redundant. The original proposal only requires the owners to keep the worker information on file. But if workers must go the police, show their valid identification and get background checks, then must attend an educational program in person and show their id, what does the final requirement to go to the city and pay \$100 and get one final check really achieve? Basically nothing, and just opens up their information to be made public. The police background check and educational requirement should be sufficient. The BRE inspectors will surely be checking the BRE's on a regular basis to ensure worker information is available and accurate.

2) the requirement to have 2 workers present should be a recommendation and not a mandate. While great in theory, it is just too onerous and cost prohibitive. For a sole operator, at 16 hours a day, \$15/hour, 30 days a month, a receptionist or security person would be an extra \$7,200/month in expenses. That is large amount of money for one or even two ladies to

absorb. Even if two ladies want to combine their resources and share a BRE what would happen if one lady is sick for a day, wants to take some time off, has errands to run, or if they want to stagger their hours to ensure maximum income opportunity? Would they still require an additional worker to be present at all times? Will they be fined or lose their license if they don't? Will they have to close for the time they would be working alone? What if the receptionist phones in sick or has child care issues, does the BRE have to close for the day, or scramble to find a replacement? And remember it is just basically to have someone present; there is no real work to be done. We don't believe city administration has really thought about these issues despite their good intention to make the work place safer. Other options such as security cameras, locking of the front door, etc should be considered.

3) It was mentioned at the committee meeting that new BRE rules will go into effect on January 1, 2021. That is only 4 months away. Yet city administration has previously indicated existing owners would have 6 months to move or close. Would that 6 month deadline start from the day council passes the bylaw or start from Jan 1, 2021? I don't think Council appreciates how much of a disruption these changes will have. For those ladies wanting to open a BRE, it means breaking existing leases, possibly forming partnerships, finding new locations, negotiating leasing terms, making renovations, getting background checks, completing educational programs, finding workers, possibly hiring additional staff. It is not a small undertaking. While still working. In a pandemic. Likely during a Regina winter.

Considering all that is involved, we request council to agree to allow until at least July 1, 2021 to start enforcement against existing BRE establishments that may have trouble finding suitable new locations.

Thank you.

Hello,

My name is Andrea Heinz. I am exited from 7 years in Edmonton's licensed Body Rub regime where I was bought for sex over 4300 times. I entered the industry at age 22 due to limited education and skill, coupled with \$60 000 of debt. For 4 of those 7 years I also owned and operated a licensed Body Rub Centre. I exited at the end of 2012 and immediately began sharing my story and assisting women still trapped in the sex trade as a victim advocate with our local non-profit CEASE: Centre to End All Sexual Exploitation. I recently published a peer-reviewed paper that you will find attached, should you wish to review it.

I wanted to share my insights with you today in the hopes that you will not follow in Edmonton's failed path toward the laudable goal of harm reduction. We are often mistakenly revered for our approach. Our current system is an extremely reactive and ineffective response. Aside from the obvious moral concerns of men using money as a coercive tool to circumvent the obtainment of genuine, authentic consent from women, there are several logistical issues as well.

Licensing does not have the ability to protect the physical and emotional violence that occurs to service providers behind closed doors. A license does not stop incidents such as buyers choking providers, secretly filming them during sex acts, stalking them at their "workplace", or following them home. It does not stop the repeated degradation and verbal assaults that leave providers traumatized, many for the rest of their lives.

You'll hear that we have a 99% compliance rate to our bylaw enforcement making it sound as though Edmonton has cleaned up the sex trade. Not true. Very few providers in Edmonton are licensed. The majority operate unlicensed, using internet sites like leolist instead. Most of our street providers have migrated to the internet - only the very marginalized people remain, and these individuals would never be able to operate within a licensed framework due to complex needs such as addiction, homelessness and untreated mental health. You don't need to license to keep the sex trade from growing more visible on the streets. The rise of the internet has moved most of the activity indoors.

We have a course informing providers of their rights and responsibilities prior to getting a license but the course has grave concerns. I spent 7 years presenting there and have witnessed some alarming things including women leaving frequently to go do drugs, returning to the class, nodding off and drooling down themselves. I have also seen multiple women of Asian-descent who cannot speak any English falling asleep in the class because they were brought directly to the course after a 22-hour international flight from China. I have seen the same men repeatedly bringing women to the course and waiting in the lobby for them after. I have seen women cry, telling me they didn't want strange men touching them just so they can afford their rent. All of these women were readily issued licenses. I think you will agree that genuine choice was void in all their situations. I recently decided I could no longer participate in the course from an ethical standpoint and so I withdrew.

Giving legitimacy to owners is a big concern in protecting provider autonomy. While it is not infracting against the federal law (PCEPA) to allow sellers of sex to advertise and sell their own services, it is 100% against the law to allow third-party individuals to do so. Cities honor every federal law, except when it comes to that which is intended to protect women from sexual exploitation. Why is that? By licensing owners you will legitimize exploiters as every day normal business owners. This has a deep impact on providers when their own city endorses the people who profit from their pain and suffering. We have had extremely exploitative owners who operated with impunity for years, victimizing dozens of women. The license made for massive red tape in getting their Body Rub Centre license revoked. We have some studios that have figurehead owners who provide a cover for the real owners, typically people with involvement in organized crime.

Harm reduction can still be done outside of a licensing regime. Licensing inflicts bureaucratic visibility stress on the providers – no one wants to be on official documentation as a sex seller. Allow sellers to operate without requiring them to obtain a license, and do not license the owners.

There is a better approach:

- First, a multi-stakeholder standing task force including experts, police and advocates to collaborate on harm reduction strategies as well as approaches to reducing buyer demand.

- Second, voluntary registration for providers with RCMP

- Third, a full-time city social worker or exited peer who can connect with providers and offer them resources and exit supports

- Lastly, a funding stream within the City to financially assist those being sexually exploited who need supportive or transitioning dollars.

Edmonton is presently examining a 5-year phase out of our licensing. Regina has an opportunity to become an ethical leader in alignment with the federal vision and legislation against sexual exploitation. I encourage you to take it.

Thank you.

Andrea Heinz

Dear City Council,

The Protection of Communities and Exploited Persons Act (PCEPA) has made it legal to sell intimate body massage, in an effort to protect the vulnerable trapped young workers from further injury from our justice system. However, PCEPA still makes it illegal to purchase these services (johns), for others to profit from the sale of it (owners/pimps), or for advertisement to be made (by owners/pimps only).

- You have voted to allow body rub establishments in our Regina industrial areas. Although I believe this is a destructive and despicable option for a business, I understand the desire to want to protect the women from an industry that could go "underground" if it were forced out. These women are incredibly vulnerable.
- You will be voting on licensing the owners or operators (pimps) as recommended by Regina City Administration. **Please be reminded that this is still illegal in Canada, as clearly outlined in PCEPA. I am in opposition to licensing pimps.** We cannot and should not license illegal activity in our City. Illegal activity should be enforced to be stopped, not sanctioned through licensing.
- While the claim of those recommending licensing of pimps is that our street workers will be better protected; I disagree. Past workers of other licensed body rub establishments in Canada report, or are found, to being abused, neglected and trapped.¹ Imagine if it were your sister, daughter, niece or grandchild. These establishments are not helping people choose clothing, designs for their home, or receive health and beauty services. They are places where a woman's body is used as a tool for someone else's pleasure. It is a deeply personal and vulnerable service being offered. These establishments are known to employ vulnerable Asian women, and not Regina street workers. **We talk about fighting systemic injustice in our city and in our world. Here is a silent group of people, trapped on the margins. Are you going to willingly, knowingly, and consciously, subject them to further injustice, marginalization, and abuse, using the law, a law that you have the power to wield for good?**
- If these owner/operators (pimps) are licensed, it will be nearly impossible to arrest and charge them for pimping, since that is what they would be licensed/sanctioned to do by our city officials. **How can you create a license for something that is illegal? Are you prepared for the precedent you will be setting for illegal activity in our city, should you choose to license pimps?**
- If workers are licensed, the licensing process needs ample provision for autonomy and proper safeguards for that autonomy. If any deception or falsehood is used (e.g., stating owners are not involved, but they are found out to be involved), that would be cause for automatic revoking of the license and a ban on re-applying for multiple years. There needs to be proper documentation in place during the entire licensing process whereby the workers can attest/sign that owners are not involved. This is a critical requirement for the safety of the workers, to add proper checks and balances to protect

against possible human trafficking situations from occurring. This process should also include a mechanism for exit, no questions asked, should one of the workers decide she is finished with a career in this industry and wants out. **NO ONE should be trapped and sexually exploited.**

- In addition, please ensure that our police are not hindered from enforcing the law (and protecting workers) by requiring them to give notice before attending these establishments for checkups, since this would allow all evidence of human trafficking or owner/pimp involvement to be removed in advance. Forcing them to do so reminds me of the polished concentration camps around Europe pre and during WWII. Visiting dignitaries came and saw how humanely the prisoners were being treated at those camps; we look back now and lament, *how foolish! How blind!* So let us not be similarly foolish and blind! We have the benefit of knowing about that gruesome example in history, and we can learn from it. The Nazis had time to clean up their act before visitors arrived. Aren't we, in our own small way, giving criminals a chance to do the same, if we enforce that police officers have to make an appointment before coming for a visit? A vulnerable woman in fear will lie about what is really taking place, if she knows her pimp could beat, abuse, or kill her if she says what is really going on.

Human trafficking is a major issue in our world, country, and right here in Regina. Please allow police to do their job without having their hands tied, by allowing them to check up on these body rub establishments unannounced. Do it for the protection of these women. Do it for the protection of our community. **Please ensure that the actions you take in this ruling don't aid and abet an insidious, destructive industry, from taking deeper root in our community and destroying more lives in the process.**

Licensing pimps sends the message that criminal activity is not just legal, but is welcome, in Regina. Is this really the culture we want for our city? Is this the legacy that you city councilors want to leave behind from your work on this council? Is it the future we want for our children? Licensing gives a stamp of approval to an activity, business, or event. Are you ready to compromise federal law and make pimping legal in Regina?

Please do not allow or license pimps/owners in our city!

Your citizens are counting on you. Thank you!

Chelsa Budd

Executive Committee: Body Rub Establishment Licensing Program

Date	September 2, 2020
To	His Worship the Mayor and Members of City Council
From	Executive Committee
Service Area	Office of the City Solicitor
Item #	CR20-78

RECOMMENDATION

That Council:

1. Approve the implementation of a licensing program for Body Rub Establishments as outlined in Appendix B, to include:
 - a. Licensing for establishments;
 - b. Requirements for workers and establishments including: criminal record checks, completion of an education program, proof of age and ability to work in Canada;
 - c. Reporting requirements;
 - d. Health and safety requirements;
 - e. Limited hours of operation.
2. Direct the City Solicitor to prepare the necessary bylaw to implement the licensing requirements as outlined in Appendix B Licensing Requirements, to be brought forward to the meeting of City Council one month following the disposition of this report.
3. That the workers be licensed and that the requirements for worker licenses be as follows:
 - Attendance in person to produce government issued photo identification containing legal name and age to be at least 18 years;
 - List of all aliases and/or pseudonyms;
 - Proof of completion of BRE education program;
 - Legally be eligible to work in Canada;
 - Proof of permanent residency

- Certificate of approval from the Regina Police Service; and
 - Submit license fee of \$100
4. Increase the licensing fee for owners/operators to \$1,200
 5. Approve that a minimum fine of \$2,000 be enforced in the case of an individual owner/operator for a first offense.

HISTORY

At the August 5, 2020 meeting of the Executive Committee, the Committee considered the attached EX20-26 report from the City Solicitor's Office.

The following addressed the Committee:

- Trevor Wowk
- Ljubisa Spasic
- Devon Hill, representing Freedom Catalyst Regina
- Jane Gattinger

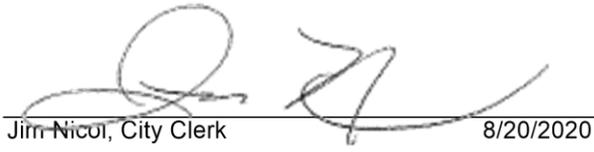
The Committee adopted a resolution to concur in the recommendations contained in the report after adding the following recommendations:

3. That the workers be licensed and that the requirements for worker licenses be as follows:
 - Attendance in person to produce government issued photo identification containing legal name and age to be at least 18 years;
 - List of all aliases and/or pseudonyms;
 - Proof of completion of BRE education program;
 - Legally be eligible to work in Canada;
 - Proof of permanent residency
 - Certificate of approval from the Regina Police Service; and
 - Submit license fee of \$100
4. Increase the licensing fee for owners/operators to \$1,200
5. Approve that a minimum fine of \$2,000 be enforced in the case of an individual owner/operator for a first offense.

Recommendation #6 does not require City Council approval.

Respectfully submitted,

EXECUTIVE COMMITTEE


Jim Nicol, City Clerk 8/20/2020

ATTACHMENTS

EX20-26 - Body Rub Establishment Licensing Program
Appendix A Jurisdictional Review
Appendix B Licensing Requirements

Body Rub Establishment Licensing Program

Date	August 5, 2020
To	Executive Committee
From	City Solicitor's Office
Service Area	Licensing & Parking Services
Item No.	EX20-26

RECOMMENDATION

The Executive Committee recommends that Council:

1. Approve the implementation of a licensing program for Body Rub Establishments as outlined in Appendix B, to include:
 - a. Licensing for establishments;
 - b. Requirements for workers and establishments including: criminal record checks, completion of an education program, proof of age and ability to work in Canada;
 - c. Reporting requirements;
 - d. Health and safety requirements;
 - e. Limited hours of operation.
2. Direct the City Solicitor to prepare the necessary bylaw to implement the licensing requirements as outlined in Appendix B Licensing Requirements, to be brought forward to the meeting of City Council one month following the disposition of this report.
3. Approve these recommendations at its July 29, 2020 meeting.

ISSUE

On September 23, 2019 City Council approved a new zoning and licensing framework that focuses on safety and harm reduction for workers, operators and their clients, minimizes community nuisances and protects the integrity of the city's residential neighbourhoods. The zoning options and the related bylaw amendments were approved by City Council in January and April 2020.

Policy direction provided by City Council included licensing the BRE only and not the workers but with requirements for the establishment to be responsible to: obtain identifying information from its workers, ensure workers are of legal age and legally eligible to work in Canada, and ensure workers receive training in safe practices and community resources. Also included in the policy direction was a plan to limit operating hours and require compliance with health and safety standards.

IMPACTS

Financial

Resources to implement the recommendation include staff and training expenses. The estimated annualized cost of the program is between \$52,287 and \$115,000. A portion of these costs will be recovered from the licensing fees collected.

Ongoing expenses related to the training program of \$10,000 will need to be requested through the 2021 budget process.

Policy/Strategic

The proposal is consistent with the policies contained within Part A of *Design Regina: The Official Community Plan Bylaw No. 2013-48* with respect to:

Section D11 – Social Development

Goal 3 – Community Security: Ensure that Regina is a safe community where everyone feels secure in their homes and neighbourhoods

OTHER OPTIONS

Licence Body Rub Establishment owners and workers

Municipal research indicates that licensing both the body rub establishment owner/operator and the workers is the most common approach. This was not Administration's recommended approach because during the engagement process workers raised concerns regarding their names being included on the licence document. Access to information legislation in Saskatchewan (and elsewhere) considers the issuance of a licence to carry on business to be public information. This means that the names of license holders (but not the supporting documentation submitted to obtain the licence) are subject to the access to information regime in *The Local Authority Freedom of Information and Protection of Privacy Act* (LAFOIPPA).

As an alternative to licensing workers, the Administration has recommended that licensed BRE owner/operators be required to verify and collect information from its workers and submit it to the City upon request. However, should Council choose to licence the workers in addition to the owners, Administration recommends that the requirements for worker licences be as follows:

- Attendance in person to produce government issued photo identification containing legal name and age to be at least 18 years;
- List of all aliases and/or pseudonyms;
- Proof of completion of BRE education program;
- Legally be eligible to work in Canada;
- Certificate of approval from the Regina Police Service;
- Submit licence fee of \$100.

Workers would also be required to submit updated information any time they changed their place of employment and renew the licence each year. The recommended fee of \$100 is consistent with the amount charged by the City of Saskatoon.

COMMUNICATIONS

Materials outlining licensing program requirements will be prepared and distributed to all current businesses and workers.

DISCUSSION

Administration conducted a jurisdictional review of licensing programs, summarized in Appendix A, held public engagement sessions, met with industry participants, the Regina Police Service (RPS) and various community interest groups to develop the proposed licensing program. All research conducted, and participants in the process acknowledged the need to ensure safety for workers, patrons and the community, resulting in a proposed licensing program with safety as its primary goal. The licensing program identifies the required documentation for owners to obtain a BRE licence, information they must collect and maintain from all workers, requirements for patrons, hours of operation, building and advertising requirements, applicable fees and violations. Each of the proposed licensing requirements are discussed below and included in Appendix B.

BRE Owner/Operator Requirements

All BRE owner/operators would be required to apply for a BRE licence. The process would be similar to the current business licence process. Licences would be issued for one calendar year and would need to be renewed each year. The BRE owner would be required to attend in person to submit the application and provide the following information and documentation at the time of initial application and licence renewal:

- Documentation regarding ownership
- Government issued identification containing legal name
- List of all aliases and/or pseudonyms
- Government issued identification showing they are 18 years or older
- Proof of completion of education programs
- Legal eligibility to work in Canada
- Certificate of approval from RPS

- Approved development permit
- Submit BRE licence fees

RPS has identified that when owner/operators and workers are required to provide proof of their identity, the level of safety increases. Collecting and maintaining this information provides some assurance that the individual is not participating against their will. Therefore, BRE owner/operators will be required to collect the following information for each worker before they begin work in the establishment and annually thereafter:

- Government issued identification containing legal name
- List of all aliases and/or pseudonyms
- Government issued identification showing they are 18 years or older
- Proof of completion of education programs
- Legal eligibility to work in Canada
- Certificate of approval from RPS

The BRE owner/operator must maintain these records for a period of twelve months and provide this information to the Licence Inspector or the Regina Police Service upon request.

Certificate of Approval Process

The Certificate of Approval Process will be conducted by RPS. The process will include a Criminal Record Check (CRC) and full enquiry into the applicant's suitability for a BRE licence and/or providing services in such an establishment. The process may include background checks determined to be appropriate by the Chief of Police, circumstances of offences, involvement in criminal activity relevant to operation of a BRE or providing services within such an establishment and/or an in-person interview. Once completed, the outcome would be provided to the City. This process is similar to the certificate of approval process in place for taxi drivers and ensures applicants attend to RPS in person. To ensure information is up to date, the certificate of approval and CRC must be no older than 30 days at time of application.

Education Program

Ensuring the safety for those working in this industry has been a concern for all stakeholders and Administration recommends mandatory completion of an annual training program focusing on safe practices and community resources for all BRE owner/operators and workers. It was determined the program should be facilitated by a third party with expertise in these areas. The use of a third party provider is also intended to increase the comfort and participation of workers who may not feel as comfortable receiving training from the entity who also enforces the bylaw.

Administration has approached the Regina Sexual Assault Centre (RSAC) to discuss the opportunity to develop and deliver the education program. RSAC has a mandate to reduce incidents and impacts of sexual violence through education and support, and although not all individuals engaged in BRE work require this support, they have found that ensuring engagement and support from people within the community such instances occur less frequently. RSAC will also identify experts in other areas to participate in the program. The education program will include information on topics such as:

- basic sexual health
- personal safety while working in the industry
- how to identify human trafficking risks
- overdose awareness and naloxone administration
- sexual assault programs, violence reporting and safe shelters
- how to exit the industry if desired
- bylaw regulations regarding BRE

Participants will also be provided contact information for general supports that are available, as well as a contact from both the City of Regina and RPS that will lead outreach activities. BRE owner/operators will also be required to post this information in their establishment. Successful participants will be issued a certificate from the program facilitator.

The City of Edmonton has successfully offered a similar program for the past four years. Workers have shared that the program content is informative and assists with keeping them safe.

Patrons

In discussion with RPS on measures to ensure safety, they suggested that safety is increased when patrons are required to provide identification. As a result, Administration recommends that BRE be required to obtain proof of identify through government issued photo identification for all patrons prior to providing services. For the safety of the workers, the patrons must not appear to be intoxicated in any way from alcohol or drugs. All patrons will also need to provide proof that they are over the age of 18 to enter the establishment. This requirement is consistent with all other municipalities researched.

Hours of Operation

Consultations with industry participants indicated there was a desire to operate their businesses 24 hours a day. Many identified that they are single operators and set their hours based on demand, taking time off when demand is low. Currently the City does not regulate hours of operation for other businesses that are licensed (residential businesses, pawn dealers, secondhand dealers etc.) However, research indicated that most municipalities either prescribe or restrict the hours a BRE may operate. RPS supports definitive opening and closing hours as this ensures workers are not being pressured to work all hours of the day, allowing workers time to eat, sleep and attend to other matters. To reflect the interest of this type of business and address concerns shared by the RPS, Administration recommends a restriction on the hours of operation for BRE to not operate between 2 a.m. and 10 a.m. any day of the week.

Administration also recommends that a minimum of two workers are present at all times during business hours. When reviewing other municipalities, only Edmonton requires two workers while other municipalities require the business owner to be in attendance at all times. From a safety perspective, ensuring multiple workers are present is more beneficial than prescribing whom should be present.

Building

Municipal research revealed that building requirements varied greatly from city to city. Regulations related to lighting, ventilation, washroom, sanitation, signage, separation distances, dwelling usage and entryways. Signage, separation distances and zoning for dwellings are regulated within *The Regina Zoning Bylaw*. Washroom and sanitation guidelines are specified in other provincial regulations and rather than duplicating these requirements, Administration recommends including a requirement that the BRE licence may be suspended or revoked for violations of other laws.

To promote safe access, Administration recommends that all entrances must be well lit, free from obstruction and the front door must be used for all customer entry and exit. For safety within the building, there shall be no locking mechanisms on any interior doors. These requirements are consistent with most other municipalities researched.

Although not a requirement in other municipalities, RPS suggested a mandatory mechanism for workers to alert other employees of a potential safety concern. Administration recommends that working panic alarms must be installed in or within close access to all treatment rooms.

Advertising

All advertising, including signage at the establishment, must include the BRE licence number. This requirement is consistent with Toronto, Windsor and Edmonton and ensures the ability to quickly confirm if the operator holds a valid licence.

Fees

Resources to implement the recommendation include staff and training expenses. Ongoing costs beginning in 2021 relate to licensing and RPS staff for reviewing and processing licences, outreach activities and enforcement. Additional costs for training of BRE owners and workers, in partnership with a community group, will also be incurred.

The estimated annualized cost of the program is between \$52,287 and \$115,000 as detailed below. Actual costs of the program would be dependent on the number of BRE that are licensed and those that require enforcement activities. These costs relate only to licensing and enforcement of new BRE that will begin operation under the new framework and does not include enforcement or legal costs to close operations currently in violation of *The Zoning Bylaw*.

	20 Locations	10 Locations	5 Locations
Licensing Officer	45,000	25,397	18,123
RPS Constable	60,000	33,863	24,164
Training Program	10,000	10,000	10,000
Total Costs	115,000	69,260	52,287
Cost Recovery (per location)	\$ 5,750	\$ 6,926	\$ 8,715

The proposed licence fee is not full cost recovery because this would make obtaining a licence cost prohibitive. While the licensing fees do not recover all costs related to the industry, regulating this industry benefits the safety of the community and not just members of the industry and therefore it is not inappropriate to recover the costs from general revenues.

Edmonton found that prohibitive licence costs simply lead to non-compliance. Taking a harm-reduction approach to the sector has proven to be more effective from the perspective of safety and neighbourhood impact. Feedback from RPS also indicated a preference for lower fees in order to achieve compliance and higher fines for those that do not comply. Administration recommends an annual licence fee of \$630. This is consistent with the licence fee charged by Edmonton, who also provides a training program for BRE owners, operators and workers.

Violations

Existing fines for failure to obtain a business licence (cost of the licence plus 50 per cent) are not sufficient to address the variety of circumstances and violations contained within the proposed licensing scheme. Administration recommends that fines for BRE violations be subject to determination by a court upon conviction up to the maximum amounts prescribed in *The Cities Act*.

DECISION HISTORY

CR19-78 was presented to Council at the September 23, 2019 meeting and approved an approach to massage parlours in Regina be adopted that regulates the industry as a business and that focuses on harm reduction for workers, operators and their clients and the plan to develop a licensing program for massage parlours as outlined.

CR19-112 was presented to Council at the December 16, 2019 meeting. The report was referred back for Administration to provide additional information on increasing separation distances and adding additional land uses.

CM20-1 was presented to Council at the January 29, 2020 meeting where the recommendation was approved.

Bylaw 2020-11, being *The Regina Zoning 2019 Amendment Bylaw (No. 2)* received first and second reading by Council on February 26, 2020. The Bylaw was adopted by Council on April 29, 2020.

Respectfully Submitted,



Dawn Schikowski, Manager Licensing & Parking Services 6/30/2020

Respectfully Submitted,



Byron Werry, City Solicitor

7/2/2020

Prepared by: Dawn Schikowski, Manager, Licensing & Parking Services

ATTACHMENTS

Appendix A Jurisdictional Review

Appendix B Licensing Requirements

APPENDIX B: Licensing Requirements

<p>BRE Owner/Operator</p>	<ul style="list-style-type: none"> • BRE owner/operator submits completed application in person to the Licensing Inspector • BRE owner/operator submits the following at the time of application and/or Renewal for a Body Rub Establishment Licence: <ul style="list-style-type: none"> ○ Legal name ○ Written proof of Canadian citizenship or residency status ○ List of all pseudonyms and aliases ○ An approved development permit ○ ISC corporation document, if applicable ○ Government issued identification evidencing age of 18 years or older ○ A certificate of approval done through the Regina Police Service which may consist of an interview process ○ Copy of the Completion Certificate for required education sessions • Pay the annual BRE licence fee of \$630.00 • Owners of establishments are required to keep and maintain records of the following criteria for every worker that works in their establishment for a minimum of 12 months and obtain updated documentation annually: <ul style="list-style-type: none"> ○ Legal name ○ List of all pseudonyms and aliases ○ Written proof of Canadian citizenship or residency status ○ Government issued photo identification showing age of 18 years or older ○ A certificate of approval done through the Regina Police Service which may consist of an interview process ○ Copy of the Completion Certificate for required education sessions
<p>Patrons</p>	<ul style="list-style-type: none"> • Must be 18 years of age or older • Must not appear to be intoxicated by alcohol or drugs • Provide government issued photo identification as proof of identity and age
<p>Establishment</p>	<ul style="list-style-type: none"> • Must not operate between the hours of 2 AM and 10 AM • Has no locking mechanisms on any interior doors • Entrances must be well lit and free from obstruction • Front entrance must be used for all patron entry and exit • Working panic alarms in or near treatment rooms • Have a minimum of 2 people working at all times while open
<p>General</p>	<ul style="list-style-type: none"> • Licence is valid for one calendar year expiring on Dec 31 of each year • Licences must be renewed annually • All advertising must include the business licence number • Licence may be suspended or revoked for non-compliance of the licensing bylaw and violations of other laws as determined by the Licence Inspector • Licences are non-transferable • Fine to be assessed by the courts based on the circumstances of the offence, subject to a maximum of \$10,000 for an individual and \$25,000 for a corporation