

Negative Secondary Effects of
Sexually Oriented Businesses
HB 2403

by

Scott D. Bergthold

presented to
House Federal and State Affairs
Committee
Kansas Legislature
March 11, 2021

Speaker background:

Local Regulation of Adult Businesses, 2021 Ed.
(Thomson Reuter) (co-author with Prof. Jules Gerard,
Washington Univ. School of Law – St. Louis)

Cases:

- *Ocello v. Koster, A.G. of Mo.*, 354 S.W.3d 187 (Mo. 2011) (banc) (upholding Missouri law with all of the same restrictions)
- *Enlightened Reading, Inc. v. Jackson County, Mo.*, 2009 WL 792492 (W.D. Mo. 2009) (upholding same law plus licensing requirements)
- *Heideman v. South Salt Lake City*, 165 Fed. Appx. 627 (10th Cir. 2006)

Renton v. Playtime Theatres, Inc., 475 U.S. 41 (1986)
(upholding 1,000-ft. rule)

1. Legislatures can be proactive to prevent negative effects
2. Any evidence “reasonably believed to be relevant” is sufficient
3. Government is given leeway to address negative effects

Sources of Secondary Effects Information

1. Land Use Studies
2. Crime Reports
3. Judicial Opinions
4. Investigator Affidavits
5. Anecdotal Reports

Types of Secondary Effects

1. Adverse impacts on surrounding properties
2. Crime and its attendant public safety risks
3. Human trafficking, Illicit sex acts, disease
4. Illicit drug use and trafficking
5. Litter, aesthetic impacts, noise, blight

Cases upholding similar regulations:

1. *Ocello v. Koster, Atty. Gen. of Missouri*, 354 S.W.3d 187 (Mo. 2011) (banc) (all restrictions)
2. *City of Erie v. Pap's A.M.*, 529 U.S. 277 (2000) (nudity prohibition)
3. *Heideman v. South Salt Lake City*, 165 Fed. Appx. 627 (10th Cir. 2006)
4. *Jake's Ltd., Inc. v. City of Coates*, 284 F.3d 884 (8th Cir. 2002) (6-ft. rule)
5. *Richland Bookmart, Inc. v. Nichols*, 137 F.3d 435 (6th Cir. 1998) (statewide hours)

HB 2403 includes common-sense regulations that have been repeatedly upheld by the courts

Every federal appellate case to consider dancer-patron buffers, no-touch rules, hours of operation, and open-booth regulations has upheld them as constitutional.

Secondary effects data relevant to regulating sexually oriented clubs and bookstores:

1. Summaries of Key Reports
2. Phoenix, Arizona
3. Indianapolis, Indiana
4. Garden Grove, California
5. Whittier, California

Secondary effects data relevant to regulating sexually oriented businesses:

6. Austin, Texas
7. Greensboro, North Carolina
8. Amarillo, Texas
9. Kennedale, Texas
10. Spokane, Washington Evidence re: Retail Adult Bookstores
11. 2008 Jackson County, Missouri Expert Report (describing flaws in industry reports)

Findings of expert witnesses:

1. Finding of secondary effects from sexually oriented businesses is scientifically robust, being confirmed in wide variety of data sources
2. The legislature has a substantial government interest in regulating adult businesses to prevent the identified negative secondary effects
3. Industry “counter-studies” based on ever-changing methodologies and faulty data (calls-for-service (CFS) to the police)
 - CFS are weakly correlated to actual crime
 - Most vice crimes never result in CFS

Industry experts' attacks insufficient:

1. *City of Erie v. Pap's A.M.*,
529 U.S. 277 (2000) (Linz)
2. *Daytona Grand, Inc. v. City of Daytona Beach*,
490 F.3d 860 (11th Cir. 2007) (Linz, Fisher)
3. *Doctor John's, Inc. v. Wahlen*,
542 F.3d 787 (10th Cir. 2008)
4. *Heideman v. South Salt Lake City*,
165 Fed. Appx. 627 (10th Cir. 2006)
5. *SOB, Inc. v. County of Benton*,
317 F.3d 856 (8th Cir. 2003) (Linz)

Industry experts' attacks insufficient (cont'd):

6. *Gammoh v. City of La Habra*, 395 F.3d 1114 (9th Cir. 2005) (Linz)
7. *G.M. Enterprises, Inc. v. Town of St. Joseph*, 350 F.3d 631 (7th Cir. 2003) (Linz)
8. *World Wide Video of Washington v. Spokane*, 368 F.3d 1186 (9th Cir. 2004) (McLaughlin)
9. *Fantasy Ranch, Inc. v. City of Arlington*, 459 F.3d 546 (5th Cir. 2006) (Morris)
10. *Fantasyland Video, Inc. v. County of San Diego*, 505 F.3d 996 (9th Cir. 2007) (Linz, Goldenring)



Trafficking Link:

- **Majority of the FBI's Most Wanted List for Human Trafficking were using clubs, bars, and massage parlors**
- **Jada Pinkett Smith – CNN Documentary “Strip Clubs are Breeding Grounds for Sex Trafficking”**



Domestic Trafficking:

- **Strip Club Recruitment**
- **Prevalence of Underage**

Men charged with rape, human trafficking

216 Comments

BY RON SYLVESTER

The Wichita Eagle

The 13-year-old girl saw the black Cadillac Escalade pull up to a QuikTrip, and she climbed inside with a man she had never met.

She had been told by another teen that this man would treat her better than the other pimps in Wichita.

Last week, the girl mumbled through tears in Sedgwick County District Court to tell a judge how men bought and sold her for sex.

The men she accused also were in court last week. Prosecutors say it's the first time they have charged both a pimp who they say provided the child and the "john," who they say paid for her.

Donald L. Davis, 48, and James M. Cochran, 54, stood silent as a judge entered pleas of not guilty on their behalf. If convicted, they face charges that could send them to prison for the rest of their lives.

Davis is charged with rape and human trafficking. Cochran faces three charges of rape. Their attorneys declined comment at their arraignment.

The girl is one of hundreds across the city and perhaps among 2 million around the United States exploited through commercial sex, officials think.

Girls and boys, on average, enter the sex trade between the ages of 11 to 13, according the U.S. Department of Justice.

They're exploited through strip clubs, pornography and escort services.

Investigators at the Wichita-Sedgwick County Exploited and Missing Child Unit say they have tracked local girls being

PHOTOS

« 1 of 1 »



Bo Rader/The Wichita Eagle | [Buy this photo](#)

Wichita Eagle photo illustration

[Fundraiser will aid kids forced into sex trade](#)

[Former exploited teen now runs KC-area nonprofit](#)

HELPFUL RESOURCES

[Veronica's Voice Kansas City-based education and outreach service](#) to girls involved in commercial sexual exploitation, and the closest such "safe house" to Wichita.

[National Runaway Switchboard](#): A resource to help runaways get off the street or teens thinking about running from home. Call 1-800-RUNAWAY
[On Facebook](#)

[GEMS \(Girls Educational and Mentoring Services\) New York-based outreach](#) to girls who have been involved in commercial sexual exploitation.

Watch a YouTube video from GEMS called "The Making of a Girl"

[Breaking Free](#), based in St. Paul, Minn., provides education and help to girls in commercial sexual exploitation.

[Children of the Night \[http://childrenofthenight.org/\]](http://childrenofthenight.org/) Los

False advertising

The 13-year-old girl said she told Davis she was 17.

That's not unusual, researchers say. Girls lie about their age, and pimps provide fake identification so they won't get caught trafficking children.

The girls perform in strip clubs and are made available on Internet "escort services."

"Amateur nights at the strip clubs are big," said Mike Nagy, a police officer who tracks runaways for the Exploited and Missing Child Unit. "On those nights, let's just say they can be lax on checking IDs."

Rehmert interviews girls who have worked in strip bars through the Wichita Children's Home's Street Outreach Program.

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RECENT NEWS

BRPD Makes Human Trafficking Arrest in Connection With Plank Rd. Strip Club Incident

Posted on [March 27, 2015](#)

Investigators with the BRPD Sex Crimes Division have arrested a Baker female and charged her with Human Trafficking in connection with the recent bust of an unlicensed strip club on Plank Rd.

An affidavit of probable cause says Kaylenceyia Carter, 19, 2319 College Ave., Baker, LA, is allegedly responsible for **bringing the 16-year-old victim to the club at 3773 Plank Rd. to strip for money.**



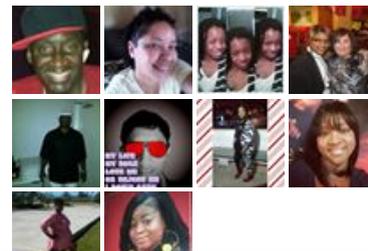
During an interview with BRPD, the teen told investigators that she contacted Carter on March 21st stating she was in need of some money because she had no job. Carter told the teen that she had been working at a strip club and could take her there for an audition.

Carter brought the teen to the club at 3773 Plank Rd. where they met with the **co-owner of the club, Trudell Richardson, also know as 'Squalee Pope.'** Richardson asked the teen how old she was, **to which the teen replied 16.** Richardson told her to tell anyone who **asked that she was 21.** He told the teen that he would introduce her to the 'money guys' and that she needed to do whatever was necessary to make the money. She was told that half of the money she made was to be paid back to the club.

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Beaverton Stars Cabaret manager admits to pimping strippers, including a 13-year-old

12.10starswarrantserve.jpg

Police served a search warrant at Stars Cabaret in Beaverton and two homes Dec. 10 linked to an alleged sex trafficking operation ran out of the strip club. (*Beaverton Police Department*)

Emily E. Smith | The Oregonian/OregonLive By **Emily E. Smith | The Oregonian/OregonLive**

Email the author | Follow on Twitter

on **September 09, 2014** at 2:42 PM, updated September 10, 2014 at 8:00 PM

Correction appended

Steven Toth, a Beaverton strip club manager, hired a 13-year-old girl to dance nude for customers and have sex with some of them.

He split the profits with her pimp.

After the girl's first day at work in fall 2012, Toth had her perform oral sex on him. Then he drove her back to her pimp.



From left, Victor Moreno-Hernandez and Steven Toth

WCSO

The prosecutor told Circuit Judge Thomas Kohl that Toth wasn't only prostituting the young teen.

During their investigation, police learned that prostitution at the strip club was common, Barton said. An informant told police that customers could select a dancer and pay the club to have sex with her off-site. This practice was against the club's official rules, Barton said.

"Unofficially, it happens," he said.

Toth was charged in a separate case with three counts of promoting prostitution related to selling sex with the women. In his Tuesday plea deal, he admitted to one of those counts.

"Is Stars still doing business?" the judge asked.

"As far as I know, yes," Barton said.

-- Emily E. Smith

Providence strip club Cheaters, facing closure, on the market for \$8 million

August 29, 2013 11:30 PM

BY AMANDA MILKOVITS

Journal Staff Writer

amilkovi@providencejournal.com

PROVIDENCE — A strip club where a missing Boston 15-year-old girl was found dancing in July is up for sale — along with the adjoining adult bookstore, strip club, gay bathhouse and “personal service club.”

Cheaters Gentlemens Club, at 245 Allens Ave., faces a possible closure by the city license board for hiring an underage girl and for the arrest of a dancer who allegedly solicited an undercover detective.

The big pink strip club is part of the “adult entertainment center” listed on stripclubs4sale.com with an asking price of \$8 million. The ad says the business and real estate — strip clubs, bookstore, megaplex club, “personal service club,” and two vacant spaces — are valued at \$11.23 million.

“This is an outstanding business opportunity that offers cash flow in excess of \$2.5 million!”

The ad doesn’t give the exact location in Providence or reveal the names of the businesses, but the description only fits the Allens Avenue properties owned by H. Charles Tapalian and registered to him and his family: Cheaters, Studio 253, Mega-Plex, Adult Video & News, and The Body Shoppe, all listed at 245, 253, and 257 Allens Ave.

Tapalian refused to speak to a Providence Journal reporter Thursday regarding the sale.

The advertisement went up on July 22, a week before the police found an underage Boston girl dancing at Cheaters. The teen was accompanied by a Massachusetts sex offender, who the police say put her to work in the club and was acting as a pimp for her and another 15-year-old girl.

Related

- Missing girl from Boston found dancing at Providence strip club
- Providence Police seek to shutter Cheaters, where missing teen was found dancing
- Providence City Council president proposes background checks for exotic dancers

Police: Man Had Sex With 15-Year-Old At Strip Club

Club Says Incident Never Happened

Steve Tellier/WLKY

POSTED: 10:57 pm EST February 13, 2012

UPDATED: 9:31 am EST February 14, 2012

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NEW ALBANY, Ind. -- Police are searching for a southern Indiana man accused of having sex with a 15-year-old girl at a strip club in May of last year.

On Monday morning, an arrest warrant was issued for 28-year-old Seth Jecker.

Court documents stated the teen was at the club with her aunt and uncle.

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A manager at The Rustic Frog, off Highway 111 in New Albany, said the incident never happened. The Rustic Frog said the family was celebrating after a

wedding.

Man gets 4 years for pimping teen



Filed by **Brad Dicken** November 23rd, 2011 in **Top Stories**.

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An Elyria man who forced a 16-year-old girl to work as a prostitute was sentenced Tuesday to 4½ years in federal prison.



Davis

Timothy "Jhon" Davis pleaded guilty earlier this year to a federal charge of juvenile sex trafficking in exchange for prosecutors agreeing to drop additional charges he had faced in the case.

Davis had potentially faced up to life in prison, but both federal prosecutors and Davis' lawyer had asked that he receive a lower sentence, court documents show.

After he completes serving his prison sentence, Davis will be monitored for five years, according to U.S. District Court records.

Davis was arrested earlier this year after the FBI launched an investigation when they saw a photo of a girl they knew to be under the age of 18 on the website Backpage.com, which law enforcement and others have said is sometimes used to advertise prostitutes.

The site listed the girl's age as 21, but when she was contacted by the Internet Crimes Against Children Task Force, the girl told her that Davis had taken the picture of her and had known how old he was, according to court documents.

"Mr. Davis admits that he is a small-time pimp," his lawyer, Leif Christman wrote, in court documents, but he also insisted that his client didn't know the girl was underage.

Christman wrote that Davis had met the girl while she was a dancer at an adult establishment and that she was using another woman's identification.

Police: Detroit strip club employed 14-year-old

By COREY WILLIAMS (AP) – 3 hours ago

DETROIT — The manager of a Detroit strip club was charged after authorities learned a 14-year-old girl was employed as a topless dancer, making several hundred dollars a night, authorities said Friday.

The 31-year-old manager of the All Star topless bar was arraigned Friday on a charge of child sexually abusive activity.

Andrew Hutson was arrested Wednesday night at the club on Eight Mile Road. The girl, whose name was not released because of her age, is believed to have danced at the club several nights each week, making about \$350 per night, Police Chief Warren Evans said at a news conference across the street from the establishment.

"It is clear that she danced there for a significant amount of time. It's clear, at least to us, that the club knew or should have known that she shouldn't be there," Evans said.

The girl's mother pulled her daughter from the club one night last week after learning she was working there. Employees of the club brought the girl out to a lobby area near the door, said her mother, whose name was withheld to protect her daughter's identity.

"Our youth are not some cheap commodity, to be used and cast aside," Prosecutor Kym Worthy said in a release. "We are sending a clear message that if you hire underage women you will face criminal charges."

AP Associated Press

Photo 1 of 2



All Star topless bar on Eight Mile Road is shown in Detroit, Friday, April 23, 2010. Police say the manager of a northwest Detroit strip club has been charged after authorities learned a 14-year-old girl was employed as a topless dancer. (AP Photo/Paul Sancya)



November 6, 2008

Lincoln Park strip club sued in teen dancer's death

FREE PRESS STAFF

The family of a 17-year-old who died of a drug overdose the first night she worked as a stripper filed a wrongful-death lawsuit Wednesday against the club where she worked.

Stephanie Brown died March 16, 2007, after dancing at the Atlantis Lounge in Lincoln Park, which hired her after she presented a fake ID.

The night before, she met Deleon Alexander II, a volunteer Ecorse High School coach, who took her and another exotic dancer to a Melvindale motel and gave them cocaine. He was convicted of delivery of a controlled substance causing a death and sentenced to 11 to 20 years in prison.

The multimillion-dollar suit names the club and its owner, Nagy Mickhail.

Dallas club where girl, 12, stripped will keep license

10:39 PM CDT on Wednesday, March 26, 2008

By TANYA EISERER / The Dallas Morning News
teiserer@dallasnews.com

The mere fact that a 12-year-old girl danced nude at a northwest Dallas strip club isn't enough to close its doors.

That's because the city ordinance that regulates sexually oriented businesses does not allow authorities to revoke the license of such a business for employing someone under the age of 18.

The sixth-grader danced at Diamonds Cabaret over a two-week period late last year, authorities say. They also say they found a 17-year-old girl working in the club in January.

Virginia News

Richmond strip club owner to face additional charge

From NBC12 News

There was an unexpected twist in the case against a controversial Richmond strip club owner Tuesday. Prosecutors say they're seeking an additional charge against Samuel Moore. But, the man in question wasn't in the Richmond courtroom.

Moore was supposed to go to trial Tuesday on two charges of contributing to the delinquency of a minor. Prosecutors said Tuesday they plan to try Moore on those charges plus a felony charge of videotaping sex with a minor.

But, Moore wasn't in court. His attorney telling the judge he's in the psych ward at VCU.

The evidence apparently continues to mount against Samuel Moore. During a raid last month at his Club Velvet, the Shockoe Bottom strip joint, investigators confiscated a host of items including video.

As a result, prosecutors next month will ask a grand jury to indict Moore on a felony charge of videotaping sex with a minor.



wfsb.com

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Manager of strip club arrested for employing a minor



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BERLIN (AP) -- Berlin police have charged the manager of a strip club with employing a 15-year-old stripper at the Infrared Cafe.

Kenneth Pina, 61, has been charged with employing a minor in an obscene performance as well as risking of injury to a minor. Police say they had gone to the club in February after receiving a complaint from the girl's family that she was dancing at the club.

Police says the girl, who lives in Waterbury, was taken out of the club and sent back to Waterbury. Pina, who lives in New Britain, was arrested Monday and released after posting bond.

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03/10/2005

Briefs

Strip club owner to go to trial

SCRANTON -- A strip club manager accused of letting a 14-year-old girl dance naked in his establishment -- and win the amateur contest -- will face trial on a charge of corruption of minors, a magisterial district judge decided Wednesday.

The girl, now 15, testified in Central Court that she willingly entered Superdad's in Mayfield and took off all her clothes.

Nevertheless, Assistant District Attorney Suzanne B. Tierney argued manager Antonio Dangio should be held responsible because he allegedly didn't check the girl's identification, and he twice encouraged her to dance.

Mr. Dangio, 44, whose address is the same as the club's at 1401 Business Route 6, Mayfield, did not testify.

Advertisement





Foreign Import Schemes:

- **Honduras Import Scheme (Honduras-TX)**
- **Operation Dancing Brides (Russia-NY/NJ)**
- **Ukrainian Dancer Import (Ukraine-MI)**



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Human Trafficking



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MARIA ISABEL
CRUZ



WEI LI PANG



SHU GANG LI



ROGER GALINDO-SEPEDA

Conspiring to Engage in a Conspiracy to Conceal, Harbor, and Shield Illegal Aliens

REWARD: The FBI is offering a reward for information leading to the arrest of Roger Galindo-Sepeda.

informed that they were indebted to the leader of the enterprise in the amount of \$7,000 to \$10,000, and they would have to work off their debt. The victims were then quartered in safe houses with virtually no contact with the outside world. After being forced to wear excessive makeup and immodest clothing, the victims were then transported to clubs managed by the subjects and were forced to engage in prostitution. Women who refused to comply were threatened with being reported to the Immigration and Naturalization Service and imprisoned. Additionally, threats were made to harm the victims' families in Honduras and to inform the families of the victims' involvement in prostitution.

On May 24, 2002, a federal arrest warrant was issued by the United States District Court, Northern District of Texas, Fort Worth Division, after Galindo-Sepeda was charged federally with conspiring to



ALFONSO
ANGEL DIAZ-
JUAREZ



AMPARO
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HERNANDEZ



EDDY VASQUEZ

SUMMARY
SCARS & MARKS
ALIASES
DESCRIPTION

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Operation Dancing Brides - 20 Individuals Charged for Participating in a Scheme to Recruit Illegal Immigrants to Work in Cheetah Adult Entertainment Clubs Controlled by La Cosa Nostra

December 1, 2011

Charges have been made against 20 individuals for their participation in a scheme that involved recruiting women from Russia and other Eastern European countries to illegally enter the U.S. to work as exotic dancers at adult entertainment clubs ("Strip Clubs") controlled by the Gambino and Bonnano Organized Crime Families of La Cosa Nostra.

Several of the defendants also arranged for many of the women to enter into sham marriages with U.S. citizens. Defendants ALPHONSE TRUCCHIO, WILLIAM PAZIENZA, SR., CHRISTOPHER COLON, and RICHARD GUTKOWSKI, who are members or associates of the Gambino Organized Crime Family, and ANTHONY FRASCONE, PAUL CASELLA, and LAWRENCE ZAINO, who are members or associates of the Bonnano Organized Crime Family, are charged with racketeering and extortion crimes related to their control of several Strip Clubs located in Queens and Long Island, New York, at which the women worked. These seven defendants and 13 others—ALEKSANDR KRAVETS, THOMAS DEVITT III, GERALD MONFORT, YONG WANG, BORIS YUSUPOV, VITALIY MINDYUK, ZHANNA KUZNETSOVA, ELENA TURUBANOVA, NATALIA IVANOVA, CHRISTINE GUNNING, JEFFREY RINCHEY, OSCAR ZELEDON, and ALEXANDER BELESON—are also charged with several other crimes related to the scheme, including visa fraud, marriage fraud, and transporting, harboring, and inducing the entry of illegal aliens. All of the defendants were arrested today and will be presented before U.S. Magistrate Judge Gabriel W. Gorenstein in Manhattan federal court this afternoon. The case is assigned to U.S. District Judge Victor Marrero.



UNITED STATES DEPARTMENT OF STATE
BUREAU OF DIPLOMATIC SECURITY

DIPLOMATIC SECURITY INVESTIGATES



HALTING THE SMUGGLING OF PEOPLE AND NARCOTICS

Operation Dancing Brides was a joint federal investigation into a criminal enterprise that employed Eastern European females as exotic dancers. The women entered the United States on student visas and often ended up in Mafia-connected adult entertainment jobs or in sham marriages with U.S. citizens to obtain immigration benefits. The two-year investigation culminated in 31 arrests.

Veniamin Gonikman, Accused Human Trafficker, Should Pay Victims \$1.6 Million, Prosecutors Say

The Huffington Post

Posted: 04/27/2012 12:13 pm EDT | Updated: 04/27/2012 12:13 pm EDT



Federal prosecutors Thursday urged a U.S. District Court to order accused human trafficker Veniamin Gonikman to pay \$1.6 million to 12 victims, and ignore the defendant's plea for leniency.

According to the *Detroit Free Press*, the Ukrainian nightclub owner, who was once on the FBI's Most Wanted list, faces up to 51 months in prison for his role in smuggling "Ukrainian dancers" into the United States to work as strippers.

According to authorities, the women were forced work long hours, hand over their earnings -- sometimes "\$3,000 to \$4,000" a week, according to one victim's 2007 testimony before Congress -- and were verbally and physically abused. The *Detroit Free Press* reported that authorities estimated Gonikman extorted more than \$1 million from his victims.

"I could not refuse to go to work or I would be beaten," the victim testified. "I was often yelled at for not making enough money, or had a gun put to my face."

**Statement of "Katya" Trafficking Victim from Ukraine
Before the
House Judiciary Committee
United States House of Representatives**

October 31, 2007

Good afternoon. I would like to thank the House Committee on the Judiciary for the opportunity to speak on behalf of trafficking victims. This is my story. I did not work as a maid, or on a farm. I was not made to be a prostitute. I came from another country. But I will try to speak for all survivors of trafficking, no matter what they were made to do or where they are from. Because our desire is a universal one - the desire for freedom.

Please call me Katya. I cannot use my real name today and I am also in disguise because I fear that my captors will recognize me and place my life and that of my family in danger.

In Fall 2003 I was a university student in Ukraine. I found out about a summer program that would allow me to work in the United States and study English. I was very excited. I applied for the program and obtained a student visa. I found out that I would be working as a waitress in Virginia Beach.

In May 2004 I traveled to the United States. I flew from Kiev to Washington D.C. When I landed, I was surprised to see Michael Aronov and Alex Maksimenko, people I knew from Ukraine, at the airport in Washington D.C.. They told me that I would no longer be going to Virginia but not to worry because they had worked things out and I would be going to Detroit. They gave me a bus ticket to Detroit.

When the bus arrived in Detroit I saw Michael, Alex, and another Ukrainian man that I knew, Veniamin Gonikman waiting for me. Once I got off the bus in Detroit, everything changed. They took me to a hotel and took all of my identity documents from me. They told me that they needed them in order to get a state identification card for me. They told me that I owed them \$12,000 for travel to the United States and \$10,000 for the identification document, and that I only had a short time to pay them off.

I quickly learned how I would have to pay it off. They told me I was going to have to work at a strip club called Cheetah's. They forced me to work six days a week for twelve hours a day. I could not refuse to go to work or I would be beaten. I had to hand over all of my money to Michael and Alex. I was often yelled at for not making enough money or had a gun put to my face. Every week I handed over around \$3000-\$4000 to Alex and Michael. I was their slave.