

Some evidence in this case has been redacted to protect potential victims and obscure sexually explicit content. If you would like an unredacted copy please contact the city at planning@santafenm.gov




CITY OF SANTA FE

Memorandum

Date: July 28, 2025

To: Finance Committee

From: Maggie Moore, Assistant Land Use Director

Via: Mark Scott, City Manager 
ANDREA PHILLIPS (Jul 24, 2025 11:42:01 MDT)

Heather Lamboy, Planning and Land Use Director 

RE: Request for Issuance of a Cease-and-Desist Order to close Good Luck Body Massage, 360 East Palace Avenue, Hongzhe Ding, Operator/Owner, 505-316-1127. Code Enforcement Case# 2025-4176, Violation of SFCC 18-1.7 *Notice of violation; penalty*, operating without a business license and in a manner contrary to the public welfare. (Maggie Moore, Assistant Land Use Director, mrmoore@santafenm.gov)

EXECUTIVE SUMMARY:

On June 16th, 2025, the Planning and Land Use Department (the “Department”) received a constituent complaint regarding a “questionable scene” at Good Luck Body Massage, 360 E. Palace Avenue (the “Property”). On Friday, June 20th, Enforcement Division Manager Jason Sena and Supervisor Vidal Garcia inspected the Property and observed several code violations, including illegal signage and window coverings. At the time of the June 20th inspection, the Property had a valid city-issued business license #235245; however, there were no licensed massage therapists present. The individual who was present could not be positively identified, did not speak English, and produced a New Mexico Massage Therapy License No. MT9498 issued to Hongzhe Ding. On June 26, 2025, Vidal Garcia issued violation notices (see Code Case# 2025-4175 and Case# 2025-4176), which were posted on the property and sent via certified mail to the business owner (Hongzhe Ding) and the property owner (The Eli Sanford Revocable Trust). The notices established a compliance date and Finance Committee hearing date of July 28th, 2025.

On July 7, 2025, James Moye submitted a renewal application for business license #235245, which was set to expire on July 8th, 2025. The renewal application has not been approved because the application does not meet the current requirement that at least two (2) licensed massage therapists must be included in the application to meet the code definition of a massage parlor, as a business that employs at least two (2) persons. Additionally, evidence gathered by the Department indicates that the Property is operating in a manner contrary to the public welfare (see Figure 1 and Attachments: Online Advertisements).

Per SFCC 18-1.8 *Enforcement; hearing; cease and desist order*; staff requests that the Finance Committee issue a cease-and-desist order closing the business, Good Luck Body Massage at 360 E Palace Avenue, Hongzhe Ding, operator. Such cease and desist order shall prevent the owner or operator of the business from conducting any business in the building, structure or on the land, until the terms of this section have been complied with.

BACKGROUND:

Illicit massage businesses (IMBs), commonly known as “massage parlors,” have become ubiquitous across the country, within the state of New Mexico, and in our community. Research finds an estimated 9,000-plus of these businesses operate in every state in the country, with earnings totaling nearly \$2.5 billion per year.¹ Staff research of business license records and online advertising indicates there are as many as twenty (20) IMBs operating within the city of Santa Fe, some with a valid business license, some on expired licenses, and some without the requisite business license.

The State of New Mexico, through the Massage Therapy Board, oversees the practice of individuals who use the title of massage therapist or otherwise represent themselves as massage therapists, and massage therapy schools. The State and the Board do not regulate businesses that use the title of massage or otherwise represent themselves as massage businesses. The City of Santa Fe Enforcement Division is tasked with enforcing SFCC Chapter 18-*Licenses and Taxes*, to ensure that all businesses obtain a business license, pay applicable fees, and do not operate in a manner c

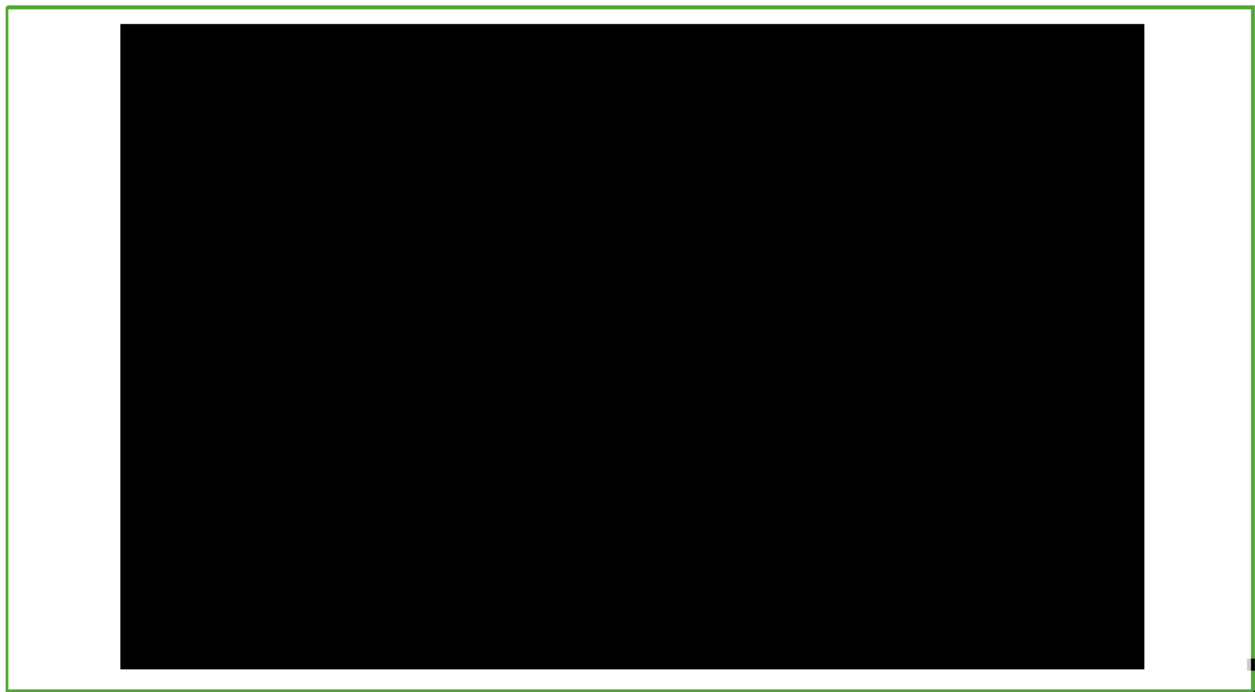


Figure 1

¹ Keyhan, Rochelle et al, “Trafficking in Illicit Massage Businesses.” Polaris, (January 17, 2018)

Acts of prostitution have a long history of concealing themselves behind the label of massage. While there may be some individuals who choose to sell sex under the guise of massage therapy, evidence suggests that thousands of women engaging in commercial sex in illicit massage businesses are victims of human trafficking. Corporate secrecy laws that obscure ownership make it nearly impossible to identify the organized crime networks and traffickers behind these operations². Traditional law enforcement approaches are resource-intensive and often focus on the women engaged in these illicit acts, further victimizing them, while the organized criminal networks and traffickers evade accountability.

In their 2024 Annual Report, the New Mexico Governor’s Organized Crime Commission (the Commission)³ summarized their recent progress in assessing and moving against organized crime in the areas of human trafficking, gun smuggling, and drug trafficking. The Commission found that rather than these criminal activities being isolated and confined in silos, they are interconnected by the common thread of organized crime. That is, criminal organizations strategically use the same resources and infrastructure for multiple illicit activities. Criminals that provide logistical support, such as safe houses, transport vehicles, money laundering, and corrupt networks for drug smuggling, also use these assets to facilitate human trafficking and gun smuggling. As part of this effort to combat organized crime, the Commission is working with the Albuquerque Police Department to shut down illicit massage parlors in Bernalillo County, and has established that IMBs in New Mexico use women who are sex trafficked from China and travel into New Mexico from California.

Additionally, many jurisdictions across the country have found success in closing IMBs through targeted business licensing requirements⁴, particularly in those jurisdictions that require all businesses to obtain a license, as Santa Fe does. Successful ordinances target the easily observable characteristics that distinguish an IMB from a legitimate massage therapy business. Trevor Vaughn, Manager of Licensing for the City of Aurora, Colorado, and an expert in identifying and preventing IMBs, has observed several factors that differentiate the business models of legitimate massage therapy businesses and illicit sex and human trafficking businesses (see Table 1).

Table 1. Illicit and Legitimate Massage Business Models

Illicit Sex and Human Trafficking Business	Legitimate Massage Therapy Business
Cheat requirements to look legit	Professional training, education and license
Advertise to people looking for sex	Advertise for health purposes
Unlicensed personnel	Licensed Massage Therapists
No records of treatments or clients	Regular business recordkeeping
Long hours, often living on site	Normal business hours and operations
Locked doors to conceal illicit activities	Professional massage practices
Advertise at lower rates	Rates match industry standard

² “Hidden in Plain Sight: How Corporate Secrecy Facilitates Human Trafficking in Illicit Massage Parlors.” Polaris (April 1, 2018)

³ Governor’s Organized Crime Commission, “2024 Annual Report.”, (December 12, 2024)

⁴ “Successful Massage Ordinance Factors.” The Network, (September, 2021)

The Department is currently engaged with the City Attorney's Office to draft a massage facility ordinance to prevent IMBs from opening via a thorough application process, and regulating those characteristics and behaviors associated with IMBs, while minimizing the impact on legitimate massage therapists, spas, and businesses. The ubiquity of IMBs degrades the integrity of legitimate massage therapists, spas, and wellness businesses operating in the community. Following the adoption of their Ordinance in 2018, Aurora closed 18 IMBs within a year and has successfully prevented new IMBs from opening in their city.

The Department intends to bring forward the legislation for adoption by the end of the calendar year and will continue targeted inspections and enforcement actions against IMBs operating within the city.

ATTACHMENTS:

Notice of Violation Case #2025-4175

Notice of Violation Case #2025-4176

Good Luck Body Massage City of Santa Fe Business License #235245

New Mexico Massage Therapy License No. MT9498 – Hongzhe Ding

Online Advertisements – 360 E Palace Avenue



City of Santa Fe
 Land Use Department
 200 Lincoln Ave.
 Santa Fe, New Mexico 87504-0909
 505-955-6538

Case Number: CODE-004175-2025	
Violation Notice	Case Type: Code Enforcement
	Date Case Established: 06/26/2025
	Compliance Deadline: 07/14/2025

Hongzhe Ding- The Eli Sanford (Rev. Trust)

Mailing Address

Notice of Violation for the following location:

Address	Parcel
360 E PALACE AVE Santa Fe, NM 87501	10657046

Violation: Other Zoning - Chapter 14 - other zoning violations

Corrective Action: *In violation of 14-8.10 (2a) (Historic 4a) -Signs
 -No business sign(s) intended to be read off the premises shall be erected or constructed without a City of Santa Fe building permit.
 (No sign/building permit was requested/approved from the City of Santa Fe Land Use Department, remove all unpermitted signs on the property)
 *In violation of 14-8.10 (4b) Occupants may place notices of articles or service for sale, necessary to the conduct of their business, behind the glass of windows or doors; provided, that the sign(s) are not more than ONE-THIRD of the glass area on which they are exhibited or ten square feet, whichever is greater.
 (Remove unpermitted business signs, window coverings/window wraps.)

Compliance Date: 07/14/2025

NOTICE OF VIOLATION

Should compliance not be adhered to, you will be subject to the penalties of Section 1-3.1. "Any violation of the Santa Fe City Code of 1987, not specifically provided for in any ordinance, resolution, rule, regulation or order to the contrary, is punishable by a fine of not more than five hundred dollars (\$500.00) or by imprisonment in the county jail for a term of not more than ninety (90) days, or by both such fine and imprisonment. Every day that any such violation continues constitutes a separate offense, except where otherwise provided."

Sincerely,

Vidal Garcia
 505-955-6538
 vjgarcia@santafenm.gov



City of Santa Fe
 Land Use Department
 200 Lincoln Ave.
 Santa Fe, New Mexico 87504-0909
 505-955-6538

Case Number: CODE-004176-2025	
Violation Notice	Case Type: Code Enforcement
	Date Case Established: 06/26/2025
	Compliance Deadline: 07/16/2025

The Eli Sanford (Rev. Trust)- Hongzhe Ding

Mailing Address

Notice of Violation for the following location:

Address	Parcel
360 E PALACE AVE Santa Fe, NM 87501	10657046

Violation: Other Zoning - Chapter 14 - other zoning violations

Corrective Action: *In violation of 18-1.7 (a)
 If a person required to secure a business license & pay a business license fee is in violation of this section or any provision of the SFCC 1987 or is operating in a manner contrary to the public welfare, the City of SF shall send the person(s) a notice of violation specifically stating the nature of the violation. (Business/Massage therapists on the premises do not have current New Mexico State Massage Certifications. All unlicensed massage therapists must discontinue practices within 15 days of receipt of Notice of Violation. The person(s) shall also appear before a City of Santa Fe Finance Committee to show cause why their business should not be closed down.)
 *Your date with the City of Santa Fe's Finance Committee is set for 7-28-25, located at the City of Santa Fe's Council Chambers 5:00pm.

Compliance Date: 07/16/2025

NOTICE OF VIOLATION

Should compliance not be adhered to, you will be subject to the penalties of Section 1-3.1. "Any violation of the Santa Fe City Code of 1987, not specifically provided for in any ordinance, resolution, rule, regulation or order to the contrary, is punishable by a fine of not more than five hundred dollars (\$500.00) or by imprisonment in the county jail for a term of not more than ninety (90) days, or by both such fine and imprisonment. Every day that any such violation continues constitutes a separate offense, except where otherwise provided."

Sincerely,

Vidal Garcia
 505-955-6538
 vjgarcia@santafenm.gov



City of Santa Fe

Treasury Department
200 Lincoln Ave.
Santa Fe, New Mexico 87504-0909
505-955-6551

BUSINESS REGISTRATION

Business Name: GOOD LUCK BODY MASSAGE LLC
DBA: GOOD LUCK BODY MASSAGE

Business Location: 360 E PALACE AVE
Santa Fe, NM 87501

Owner: GOOD LUCK BODY MASSAGE LLC

License Number: 235245

Issued Date: 7/8/2024

Expiration Date: 7/8/2025

Mailing Address: 360 E PALACE AVE
SANTA FE, NM 87501

License Type: Business License - Renewable

Classification: Business Registration - Standard

Fees Paid: \$35.00

The Mayor

The Mayor: Mayor of Santa Fe

THIS IS NOT A CONSTRUCTION PERMIT OR SIGN PERMIT. APPROPRIATE PERMITS MUST BE OBTAINED FROM THE CITY OF SANTA FE BUILDING PERMIT DIVISION PRIOR TO COMMENCEMENT OF ANY CONSTRUCTION OR THE INSTALLATION OF ANY EXTERIOR SIGN.

THIS REGISTRATION/LICENSE IS NOT TRANSFERRABLE TO OTHER BUSINESSES OR PREMISES.

TO BE POSTED IN A CONSPICUOUS PLACE



State of New Mexico

**New Mexico Regulation and
Licensing Department**

HEREBY CERTIFIES THAT

Hongzhe Ding

HAVING GIVEN SATISFACTORY EVIDENCE OF THE COMPLETION OF
PROFESSIONAL AND OTHER REQUIREMENTS PRESCRIBED BY LAW
IS GRANTED A LICENSE TO PRACTICE IN THE STATE OF NEW MEXICO

Massage Therapist

License No. MT9498

Issued 07/27/2021

Expires 10/31/2026

THIS LICENSE SHOULD BE CONSPICUOUSLY POSTED IN PLACE OF BUSINESS OR AS REQUIRED BY LAW



505-316-1127 GRAND OPENING & NEW LADY 100% sweet and Cute

Updated: Jul/07/2025 11:02AM | View:2822

Good Luck Body Massage

Tel:505-316-1127

Add:360 E Palace Ave. Santa Fe. NM 87501

8:00am—11:00pm

As Experienced masseuse in Asia, I am very happy to bring you a wonderful time here.

And you will be as full of energy as a newly charged battery!

- 1. 100% Clean and tidy rooms and warm and comfortable environment.
- 2. 100% Sweet and most beautiful Asian lady for you.
- 3. 100% The most unique and professional techniques
- 4. 100% The most professional masseuse
- 5. 100% Relaxation not experienced in other places.

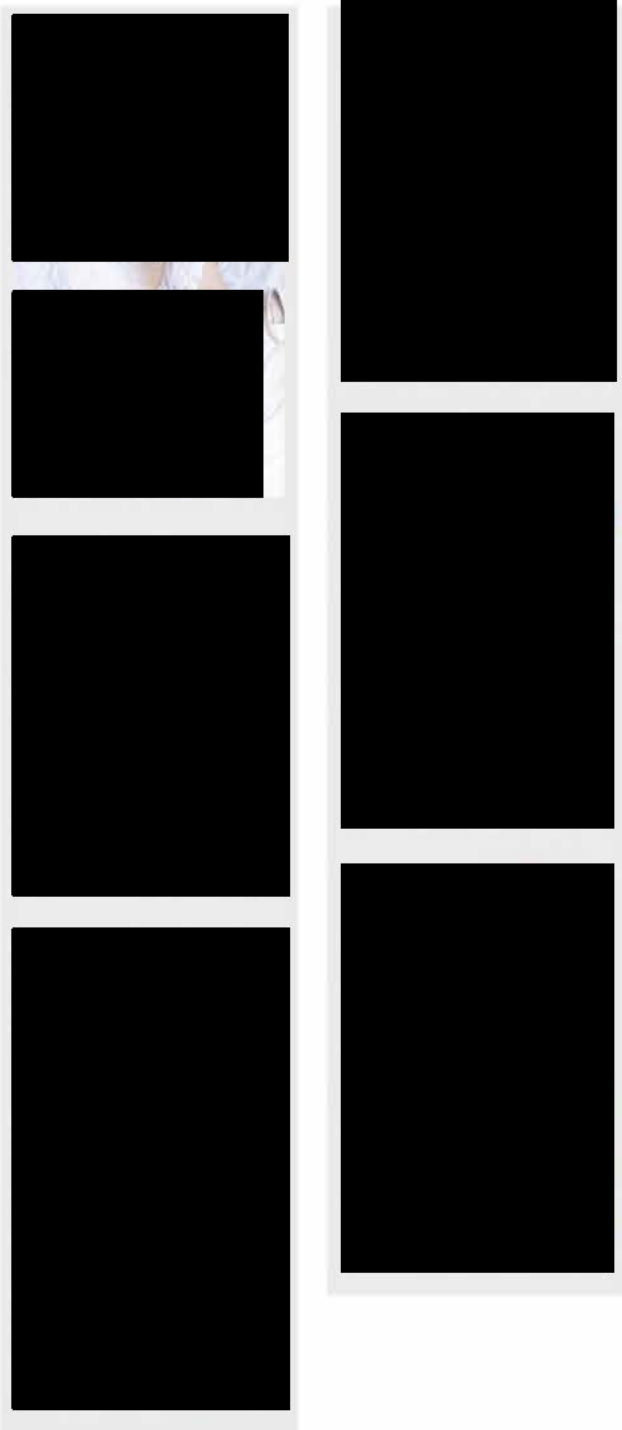
New environment, New face, New feeling

We will make your body and mind feel relaxed like never before.

We perform ensure that you get five-star enjoyment and quality services..

We are very professional and very dedicated!

Just to give you a 100% satisfactory services.!



505-316-1127

