



CITY OF SANTA FE

Memorandum

Date: December 8, 2025

To: Finance Committee

From: Maggie Moore, Assistant Land Use Director *MM*

Via: Mark Scott, City Manager
Andrea Phillips, Deputy City Manager
Elisa Montoya, Community Development Director
Heather Lamboy, AICP Planning and Land Use Director

RE: Request for Issuance of a Cease-and-Desist Order to close Korea Spa, 2008 Rosina, Unit B, ZCK, LLC, Zaiqin Wei and Yun Chin, Owners, (505-490-8339). Code Enforcement Case# 2025-005022, Violation of SFCC 18-1.7 *Notice of violation; penalty*, operating in a manner contrary to the public welfare. (Maggie Moore, Assistant Land Use Director, mrmoores@santafenm.gov)

EXECUTIVE SUMMARY:

On October 1, 2025, the Enforcement Division received a report from the Santa Fe Police Department (SFPD) of possible prostitution at Korea Spa, 2008 Rosina, Unit B. According to the report, a male customer was offered sexual acts during his massage, he refused and reported the incident to the SFPD (Police Case #2025010931). Santa Fe City Code Chapter XVI Criminal Code Section 16-7 defines *prostitution* as knowingly engaging in or offering to engage in a *sexual act* for hire and establishes that a *house of prostitution* is a public nuisance per se.

The Enforcement Division is responsible for compliance with SFCC Chapter 18 Licensing, which requires that a person conducting business in the city secure a business license and operate their business in a manner that is not contrary to the public welfare. For certain types of business, the Enforcement Division requires proof of compliance with applicable state regulations, including for food service establishments, cannabis businesses, daycare centers, and massage therapy businesses, among others. Requiring compliance with applicable state laws supports the city's provision that businesses operate in a manner not contrary to the public welfare.

The state has established several requirements for licensing and professional conduct of massage therapists and empowers municipalities to regulate licensed massage therapists pursuant to the

Massage Therapy Practice Act. New Mexico Statutes Annotated (NMSA) 1978 Section 61-12C-5 requires that individuals shall not provide or offer to provide massage therapy services unless they are a licensed massage therapist. The state law further requires that individuals shall not use the title of massage therapist or make any representation of being a massage therapist or use any other title, abbreviations, letters, figures, signs, or devices that indicate the individual is a massage therapist unless the individual is a licensed massage therapist, and licenses issued by the state are not transferable or assignable. Additionally, NMSA 1978 Section 61-12C-11 and Section 16.7.1.9 NMAC requires that massage therapy licenses or registrations issued by the state board be posted at all times in a conspicuous place in the massage therapist's principal place of business.

Based on the referral from SFPD (Police Case #2025010931), members of the City's Enforcement Division ("Staff") inspected 2008 Rosina Street, Unit B (the "Property") on October 10, 2025. Upon approach, the main entrance to the business was locked, but Staff gained access to the property by Yang Zhenghui, who provided a New York State Learner Permit as identification (see Attachment A.1). There were no other individuals present at the time of the inspection, and Ms. Zhenghui who is not a licensed massage therapist, flashed a member of our enforcement team by raising her dress to expose herself.

Through online translation services, Staff informed Ms. Zhenghui of the requirements for a valid business license, that licensed massage therapists must have their licenses posted in a conspicuous place in the business at all times, that primary entrances and exits must remain unlocked when the business is open, and directed her that only licensed massage therapists were allowed to provide massages per NMSA 1978 Section 61-12C-5.

Korea Spa has a city business license #236636, issued on 4/24/2024 and renewed on 4/24/2025 (expires 4/24/2026), affiliated with Zaiqin Wei. Previously, the business was named Excellent Spa and was affiliated with Peijung Chen (Massage Therapy License # MT9418). At the time of the inspection, the license was not posted at the property; only an invoice for a business license was posted.

Following the inspection, the Enforcement Division gathered evidence that the business is advertising for illicit sexual activities online (Attachment A.4), did not employ licensed massage therapists, and is operating in a manner contrary to the public welfare by advertising and offering sexual acts under the guise of massage therapy sessions.

The ZCK, LLC was filed with the NM Secretary of State's Office on August 31, 2022, and was organized by Bradley J Morris an accountant affiliated with the Chinese American Service Center (CASC), LLC. Mr. Morris stated he was aware of at least 3 massage parlors owned or operated by Zaiqin Wei and her husband Yun Chin, two in New Mexico and one in Amarillo, TX (see Table 1).

China Massage/Asian 2 Massage, was located at 3600 Rodeo Lane B2 in Santa Fe, and is not currently operating at that space, but there is a record of illicit online advertising for that business and the affiliated phone number.

A property search for Moon Spa, located at 3314 SW 45th Ave on the Potter Randall Appraisal District website (prad.org) confirmed that Ms Zaiqin Wei is the owner of Moon Spa in Amarillo, TX and lists a mailing address of 8758 Sevano Circle NE, Albuquerque for Ms. Wei, which matches her NM Driver’s License. There is also a record of illicit online advertising associated with this business phone numbers (626) 227-6183 and (505)361-7597. Online searches also connect the 626-227-6183 number to another closed massage parlor at 1301 S St Francis Drive, also under the name Asian 2 Massage.

Table 1. Massage Parlors owned or affiliated with Zaiqin Wei

Business Name	Address	City	Phone Number
Korea Spa/Excellent Massage	2008 Rosina Unit B	Santa Fe	505-490-8339
China Massage/Asian 2 Massage	3600 Rodeo Lane B2	Santa Fe	505-424-6458 (closed)
Moon Spa	3314 SW 45 th Ave	Amarillo	626-227-6183 / 505-361-7597
Asian 2 Massage (closed)	1301 S St Francis Drive Ste A	Santa Fe	626-227-6183 (closed)

On November 5, 2025, Carl Krings issued a violation notice (see Attachment A), which was posted on the property, sent to the business owner, Zaiqin Wei and the property owner, M3 CO, LLC, G Alan Myers. The notices established a compliance date of November 20th and a Finance Committee hearing date of December 8, 2025.

On November 14, 2025, Carl Krings met with Zaiqin Wei, Qui Li, and Yang Zhang (phone) at City Hall to review additional records. Through a translation application and with additional translation support of Yang Zhang, Carl received the massage therapy licenses of Zaiqin Wei (MT-2025-0220 Issued 10/28/2025) and Qiu Li (MT-2025-0216, issued 10/21/2025). On November 18th during normal business hours, Enforcement Staff conducted a follow-up inspection of the property and found the while the massage and open signs were on, the front door was locked and staff was not granted access onto the property to verify compliance with the law.

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, Korea Spa, ZKC, LLC at 2008 Rosina, Unit B, Zaiqin Wei, owner/operator.

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 valid business licenses, expired licenses or without the requisite business license. The

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

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 to be 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.

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 criminal networks and traffickers evade accountability. Furthermore, the ubiquity of IMBs degrades the integrity of legitimate massage therapists, spas and wellness businesses.

Many jurisdictions have found success in closing IMBs through targeted business licensing requirements³, particularly in those jurisdictions which require all businesses to obtain a license, as Santa Fe does. Successful ordinances target the easily observable characteristics that distinguish an illicit massage business from a legitimate massage therapy business. Trevor Vaughn, an expert in identifying and preventing IMBs, has observed several factors in the business models of legitimate massage therapy businesses and illicit sex and human trafficking businesses (see Table 2).

Table 2. 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

The Department is currently engaged with the City Attorney’s Office to draft a new massage facility ordinance to prevent IMBs from opening via a thorough application process, and regulating those characteristics and behaviors associated with IMBs. In Aurora, Colorado, multiple IMBs predated the passage of its ordinance in May 2018. By allowing the city to close businesses for

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

³ “Successful Massage Ordinance Factors.” The Network, (September, 2021)

committing certain violations, such as operating without a license, Aurora closed 18 IMBs within a year after its regulations went into effect.

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 illicit massage businesses operating within the city.

ATTACHMENTS:

- A. Notice of Violation Case #2025-005022
 - 1. Yang Zhenghui New York State Learner's Permit #686-196-768
 - 2. Korea Spa Santa Fe Business License #236636 (Expires April 24, 2026)
 - 3. Zaiqin Wei New Mexico Driver's License #519013231
 - 4. Illicit Online Advertisements – 2008 Rosina Unit B, 505-490-8339