



RACINE COUNTY SHERIFF'S OFFICE

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Sheriff Christopher Schmalting

Chief Deputy James P. Weidner

RE: MESSAGE ESTABLISHMENT APPLICATION REVIEW – SUNFLOWER SPA

On July 17th, 2026, I received an email from Assistant City [Racine] Attorney Ian Pomplin regarding an application for massage establishment. Attorney Pomplin inquired into any information or background that could assist the Public Safety and Licensing Committee in deciding to approve or deny the license application.

The application I reviewed was for Sunflower Spa to be located at 906 State Street. The applicant's name was listed as "Zhao Di Zou" and "Zhaodi Zou" with an address of 1306 Velp Avenue in Green Bay, WI. A previous employment address was included of "QQ Massage Spa" in Green Bay, Wisconsin, along with "housewife and part-time" as a description. The phone number (262) 399-3417 was provided by Zou for contact.

Previous Knowledge of Address

I know that a massage establishment has, or had, been operating at the 906 State St. address under the name Hunan Spa. Hunan Spa was the corporate entity name in Wisconsin DFI search with Yaqin Yang as a registered agent. Yang became subject of an illicit massage business (IMB) investigation by local law enforcement based on complaints around her other business, Seme Foot and Body Massage in Mt. Pleasant, WI. Yang was ultimately referred to the Wisconsin Department of Safety and Professional Services who suspended her license. Yang voluntarily surrendered her license permanently with both Seme Foot and Body Massage and Hunan Spa closing in early 2025.

Hunan Spa has resumed operations intermittently at times, having been licensed under a different name in mid-2024. Hunan Spa has appeared in online advertisements as recently as June 8th, 2025, featuring suggestively posed or dressed females on the website SkipTheGames.com, which is almost exclusively utilized for facilitating commercial sex services and frequently exploited by individuals engaged in human sex trafficking. Additionally, Hunan Spa appears on at least one website utilized for listing and submitting reviews for commercial sex services received at illicit massage businesses.

FINDINGS

In doing a background investigation into the information provided, I observed or learned the following:

- Zhaodi Zou is a licensed massage or bodywork provider through the Wisconsin DSPS.
 - The phone number provided by Zou – (262) 399-3417 - is the same phone number that has been listed and operating for Hunan Spa for some time, including while Hunan was operating as a suspected or confirmed illicit massage business with mentions of the phone

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- number on sexually illicit website and last observed in sexually suggestive or explicit advertisements on such websites (i.e. skipthegames) in May of 2025.
- The address provided by Zou of 1306 Velp Avenue is not a residential address and appears to be a commercial structure.
 - The address was shown in an online database to be associated with Wanghua Spa Inc. [WI DFI].
 - Google showed a connection between Wanghua Spa Inc. and GONH Spa of 127 S. Military Ave. and/or the Velp Ave. address in Green Bay.
 - News articles from the Green Bay area showed the following:
 - *On Oct. 7 [2024], Green Bay police recommended that the Protection and Policy committee deny the Gonh Spa's application for a license. The business re-issued that request after relocating from Military Ave. to Velp Ave. Video shows police addressing the committee and stating the following: "Another one of our officers caught it and said 'Hey we've actually got some pretty significant history here, you should know this, take a look at it,' and that's why we're recommending denial today." Police detailed violations against the business including an incident where a woman claims she found her husband being touched sexually by two workers. A second spa was also denied by the council. "We have opened a criminal investigation at this point," Green Bay Police Chief, Chris Davis, said. "That inquiry is ongoing."*
 - Zou listed “QQ Massage Spa” in Green Bay as a previous employer; Two such locations exist(ed) in the City of Green Bay. An inquiry was made with Wisconsin Department of Workforce Development who regularly conducts inspections and investigations into massage business operations.
 - The business QQ Massage Spa associated with 1315 W. Mason St. was visited in November of 2024 with no indication of illicit massage business activity at the time.
 - A reach of Rubmaps.ch, a website exclusively utilized for the cataloging and review of illicit massage businesses, showed two (2) reviews for the business in October of 2021 and November of 2025.
 - The business QQ Spa located at 2257 S. Oneida St. in Green Bay showed two (2) reviews on Rubmaps.ch, one each in February and June of 2026.
 - *Legitimate massage businesses do not appear on Rubmaps due to no sexual activity occurring.*
 - A search of Zou through an online database showed previous address history. The previous addresses included 127 S. Military Ave. in Green Bay [Sept ‘24] (see above/below) and 234 W. 15th in Davenport, Iowa [Jan ‘20 to Oct ‘23] with listings in Flushing, New York in between addresses in the Midwest.
 - *Individuals involved in the operation, either controlling or victim status, are known to frequently associated to addresses in Flushing, New York as a place of entry before being relocated or trafficked to other locations throughout the United States.*
 - The S. Military Ave. address is associated to GOHN Spa in Green Bay which is listed as “Closed” on Rubmaps but shows to have been reviewed 27 times between 1/17/17 and 11/8/23 (first and last reviews).
 - The Davenport, Iowa address is associated with Shanghai Spa which is listed as “Closed” on Rubmaps but shows to have been reviewed 45 times between 3/18/17 and 2/28/24 (first and last reviews).
 - *Individuals involved in the operation, either controlling or victim status, will frequently utilize the business address as their own. This is especially true in the case of victims who*

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often reside at the business itself - out of necessity, coercion or force, not choice - often in violation of local health and/or fire ordinances.

- Zou listed herself as the only proposed licensed massage provider on the renewal for Shiatsu Spa. Zhu also listed herself in the same manner on the application for the City of Racine.
 - *Known or suspect illicit massage businesses will often operate under a single individual's and/or entity's legitimate licensing/permit with other unlicensed "workers" providing the actual massages. (see conclusion).*
- I know through violation specific training and experience in investigating illicit massage businesses that when a business or operator comes under scrutiny of local government offices or law enforcement, efforts will be made to turn over the business to a "new" owner or manager, often under a new "clean" name, while maintain the business location and operations as the same.
 - The new owner/business are often approved without much, if any, background investigation and the business will continue operating as an illicit massage business until the next instance of scrutiny causes another change in name/ownership.
 - Elements of the "old" businesses will remain unchanged, such as the address or phone number due to customers having familiarity with both, occasionally intimate familiarity to include frequent direct text messaging communication with "massage providers" or "managers" to arrange for commercial sex acts.
 - The "new" business will often exploit the change and increase ad traffic or physically advertise "under new ownership" to capitalize on the change.

CONCLUSION

In certain instances, the information provided on the application for Sunflower Spa's massage establishment permit appears to have direct links to known or suspected illicit massage businesses.

An illicit massage business (IMB) is commonly defined as an establishment that puts on the façade of a legitimate massage business in order to facilitate commercial sex services, often performed by unlicensed female workers who are victims of sex trafficking. Additionally, the Human Trafficking Institute adds:

"Victim workers spend years moving "to different cities and states, cycling in and out of IMBs, where they often sleep onsite and are expected to perform sexual services for an average of 6 to 10 customers per day (and often higher numbers of customers in many cities). In exchange, they receive payment toward their debt, which includes but is not limited to, the costs of their transport to the United States, lodging (in said business, often under surveillance), food, etc."

I recognize the application information as being consistent with individuals or victims involved in the operation of illicit massage businesses. This is based on my training and experience as a law enforcement officer, which includes a previous assignment to a human trafficking task force which provided violation specific training to include illicit massage business investigations.

Respectfully submitted,

Investigator Luke Johnson #9741
Racine County Sheriff's Office

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