

Report to Community and Protective Services Committee

To: Chair and Members
Community and Protective Services Committee
From: Scott Mathers, MPA, P. Eng., Deputy City Manager,
Planning & Economic Development
Subject: Adult Live Entertainment Parlour - Relocation Request – (from 2010 Dundas Street to 238 Dundas Street) - Public Participation Meeting
Date: August 23, 2022

Recommendation

That, on the recommendation of the Managing Director, Planning and Economic Development and Deputy City Manager, in response to an application made under the Business Licensing By-law L.-131-16 (the By-law) for substituting an existing Adult Live Entertainment Parlour location at 2010 Dundas Street to a proposed new location at 238 Dundas Street, the submission from the Licence Manager **BE RECEIVED** noting that City Council shall make the final decision whether or not to amend the Licensing By-law to permit the substitution.

Summary

Staff have received a request to amend the Business Licensing By-law Schedule 3A to substitute the Adult Live Entertainment Parlour at 2010 Dundas Street for a new location at 238 Dundas Street. Council may consider applications for substitution once several criteria have been met, including at least one public meeting at Community and Protective Services Committee (CPSC).

This report compiles the materials required by the By-law for consideration of the substitution request by CPSC and Council. The report also includes the comments and recommendations received in response to the notice of Application, and some additional information considered necessary by the License Manager regarding locating adult entertainment parlours.

1.0 Application Requirements

1.1 Substitution Requests

The Business Licensing By-law L-131-16 (Schedule 3, Part 9) provides that Council may consider applications to substitute a new location for an existing location of a licenced Adult Live Entertainment Parlour. The Licence Manager shall circulate the application and submit comments to the Community and Protective Services Committee. Council shall make the final decision on whether to amend the By-law to remove the existing location and approve the new requested location.

The Licensing Office received the some of the necessary application material necessary to consider relocating an existing Adult Live Entertainment Parlour from 2010 Dundas Street to a new location at 238 Dundas Street, in November of 2021. The 2010 Dundas location has been licensed since 1988 as an Adult Live Entertainment Parlour.

1.2 Location Requirements

Schedule 3, Section 9.0 of the Business Licensing By-law provides location requirements for Council's consideration of the substitution of a new Adult Live Entertainment Parlour:

9.2 (1) (a) An Adult Live Entertainment Parlour shall not be located on lands according to the City of London's Zoning By-law Z-1 or any successor by-law which are exclusively zoned Residential, or lands zoned Residential in combination with a compound zone;

9.2 (1) (b) An Adult Live Entertainment Parlour shall not be located within 100 metres of lands according to the City of London’s Zoning By-law Z-1 or any successor by-law which are exclusively zoned Residential, or lands zoned Residential in combination with a compound zone;

9.2 (1) (c) An Adult Live Entertainment Parlour shall not be located within 100 metres of the premises of a school, a day-care centre or a place of worship, existing on the date of the request for an amendment to Schedule 3A of this By-law;

The proposed location at 238 Dundas Street complies with these locational criteria, as confirmed by City of London Planning Staff on March 10, 2022, using the separation distance outlined in Schedule 3, Section 9.2 (2) of the Licensing By-law.

1.3 Fully Completed Application

Section 9.3 states that any request under section 9.1 shall be made to the Licence Manager and shall be accompanied by a fully completed application for the issuance of an Adult Live Entertainment Parlour Owner licence.

At the time of writing this report, the Licence Manager is satisfied that the application can be considered “fully completed” for the purposes of consideration of the substitution request.

1.4 Circulation for Public Comment

Section 9.4 indicates that the Licence Manager shall give notice by personal service or prepaid first-class mail to every owner of land within 120 meters of the proposed new location who may submit comments and recommendations to the Licence Manager in respect of the request within such time, which shall be within thirty (30) days of the notice by the Licence Manager of the request, as the Licence Manager may specify in the notice.

Notice of the application was mailed to all landowners within 120m of the proposed new location on January 25th, 2022, indicating that comments were to be received by February 24th, 2022: 30 days following mailout.

A copy of the notice is attached hereto as **Appendix ‘B’**.

1.5 Comments

The comments and recommendations received by the Licence Manager in response to the notice described above, together with any additional information that the Licence Manager considers necessary, shall be submitted to the Community and Protective Services Committee as per Section 9.5.

SUMMARY OF PUBLIC COMMENTS:

There were six (6) comments received from the public regarding the Notice, which was mailed to 93 recipients. The responses are summarized as follows:

- Proximity to the Central Library is a concern.
- Public perception of downtown safety already at all-time low; this will make it worse.
- This business will drive businesses and residents away
- Downtown touted as a tourist mecca: is sex tourism a new goal?
- Newspaper article citing “*adult based entertainment for LGBTQ community*” is a veiled justification to allow strip club.
- “Burlesque” and “Drag” shows at current Lavish are different than a “Strip Club”
- Poor fit for revitalized street funded by City
- Current business at 238 Dundas already disruptive

- Two-thirds of all sex-trafficking in Canada originates in Ontario and London is a hub for sex trafficking because it is the first large city located between Detroit/Windsor and Toronto with easy access from the 401 into hotels and motels.
- Traffickers frequently target individuals who lack strong support networks, are facing financial strain, have experienced violence in the past, or who are marginalized by society. Without adequate community support, youth who are LGBTQ2+ may be at particular risk for sex trafficking.
- Does not support strategic plan goal to, “create a safe London for women and girls” with the outcome being “to enhance the potential for women and girls to live safe lives”.
- Deny the application and revoke the existing Licence.
- No issue with staff, but fearful of the patrons of these establishments re. noise, nuisance, disruption, safety concerns.
- Lavish has been a pillar of LGBT community and my comments do not apply to Lavish hosting burlesque shows.

A large “Notice of Application” poster was affixed to the exterior of 238 Dundas Street, to notify the public. The Notice was also circulated to 15 internal and partner agencies, including the Ward Councillor, Downtown London, Fire Services, Police Services, the Middlesex London Health Unit, Tourism London, London Housing Division, Planning Division, and others.

Full comments are attached in **Appendix ‘C’**.

ADDITIONAL COMMENTS & INFORMATION

London Police Services re. Existing Location:

2010 & 2190 Dundas St.

- There are approximately 280 Calls for Service associated at these addresses in the last 5 years.
- The call types vary from “Assisting other Agency”, “Trouble with Person”, “Disturbance”, “Drug”, “Domestic”, “Assault” and “Medical” calls.
- **Note:** due to the proximity of these two adult live entertainment parlours many calls for service involved both premises as well as the habitable premises at 2010 Dundas Street.

Planning & Economic Development – Urban Design

There are no urban design related concerns with the proposed Business License Amendment. Please note that the property is located within the Downtown Heritage Conservation District designated pursuant to Part V of the Ontario Heritage Act. Heritage Alteration Permit approval is required for any exterior alterations to the building (e.g., signage, façade alterations, windows, etc.) that may be required for a new business.

1.6 Public Meeting

The requirement expressed in Section 9.6 of the By-law, stating that *“Before an amendment to Schedule 3A of this By-law is passed, the Community and Protective Services Committee shall hold at least one meeting that is open to the public for the purpose of affording an opportunity to the requester and any other person who attends the meeting to make submissions in respect of the request”*, shall be satisfied by the August 23rd meeting for which this report has been prepared.

2.0 Additional Information

2.1 Context

The subject property is occupied by a three-storey commercial building which operates as a bar/nightclub (Lavish).

The subject property is within the Central London Planning District, the Downtown Heritage Conservation District, the Downtown Business Improvement Area, and fronts onto Dundas Place; “*London’s premiere pedestrian destination for shopping, dining, art, and celebration*”.

238 Dundas Street is flanked by a record store and yoga studio to the west, and a used bookstore to the east. Across the street is the entrance to the main branch of the London Public Library (251 Dundas), and the vacant heritage designated, “Mechanics Institute” (229-231 Dundas).

2.2 Adult Entertainment Impacts

The primary means that municipalities use to regulate adult-oriented businesses include zoning and licensing by-laws. These municipal regulations are justified on the general grounds that adult-oriented businesses generate negative secondary impacts. The zoning and licensing by-laws are considered by municipal Councils in a public forum via advertised public meetings.

As has been provided in previous new licence, and licence substitution reports, staff often refer to land use commentary provided in the book, “*Everything You Always Wanted to Know about Regulating Sex Businesses*” by David E. Kelly & Connie Cooper (American Planning Association, Chicago, 2001).

This reference presents survey data, among other evidence, demonstrating the significant negative impacts concentrations of adult-oriented businesses have on surrounding neighbourhoods; for 2-3 blocks from the ‘source’. These impacts include:

- Reduction in residential and commercial values
- Difficulty in selling or renting homes and businesses
- Perceived impact that neighborhood is unsafe
- Increases in vice-related activities and other crimes
- Negative impacts re. noise, lighting, and traffic
- Risk for minors to exposure or contact
- Overall community blight

More recent examples can be found in “*Cities and Adult Businesses – A Handbook for Regulatory Planning*”, Edited by Roger Kemp (McFarland & Company, North Carolina, 2010). This reference reports on case studies that describe the impacts of, and analyze the regulation of, adult-oriented businesses identifying various methods undertaken by local governments.

As Hakes^a writes after reviewing studies undertaken in other communities:

- Crime rates are higher in areas of adult uses
- Sex crimes are higher in areas near adult uses
- Residential property values are decreased when in close proximity to adult uses
- Physical blight is seen near adult uses
- Near adult uses residential properties are not well maintained, financial institutions are more hesitant to invest, etc.

^a Hakes, Jaclyn, “*Saratoga Springs Planning Board Reviews its Adult Use Laws*”, from Chapter 36, “*Cities and Adult Businesses – A Handbook for Regulatory Planning*”, Edited by Roger Kemp (McFarland & Company, North Carolina, 2010)

- Most patrons of adult oriented businesses do not live within one mile of the site.

These studies highlight the negative impacts sex businesses have on property values and crime levels, especially when the businesses are geographically concentrated.

In Chapter 33, Owens^b concludes that among the best practices for regulating sex-oriented businesses is to include minimum separation distances not only from sensitive land uses (as the City of London Business Licensing By-law does) but from other sexually oriented businesses as well.

2.3 Other Adult Entertainment Locations

It should be noted that there is an existing *Adult Live Entertainment Parlour* (Solid Gold) located approximately 50m west of this proposed relocation. There is also a relocation application for an *Adult Entertainment Body-rub Parlour* from 808 Exeter Road to 232 Dundas Street, approximately 12m west of this application.

3.0 Conclusion

An application was received to substitute an existing Adult Live Entertainment Parlour at 2010 Dundas Street to a proposed location at 238 Dundas Street. The proposed location meets the locational criteria of the Business Licensing By-law. This report summarizes the public comments received in response to the Notice of Application and includes supporting material deemed necessary by the Licence Manager. City Council shall make the final decision on whether to amend the Business Licensing By-law to permit the Adult Live Entertainment Parlour at the proposed location.

If an amendment to Schedule 3A of the By-law is permitted, the current licensed location shall be deleted from the By-law Schedule and the proposed location added to the By-law Schedule. A draft amendment is included with this report as Appendix 'A', should CPSC make this recommendation to Council.

Alternatively, City Council may refuse the application resulting in no changes to the existing By-law & Schedule; the current location at 2010 Dundas will remain an approved location.

Prepared by: Ethan Ling MSc.
Development Policy Coordinator, Municipal Compliance

Submitted By: Nicole Musicco,
Coordinator, Municipal Compliance

**Reviewed &
Concurred by:** Orest Katolyk, MPL, MLEO(C),
Director, Municipal Compliance

Recommended by: Scott Mathers, MPA, P. Eng., Deputy City Manager,
Planning and Economic Development

^b Owens, David, "Raleigh Laws Challenged By Adult Businesses" from Chapter 33, *Cities and Adult Businesses – A Handbook for Regulatory Planning*, Edited by Roger Kemp (McFarland & Company, North Carolina, 2010)

Appendix "A"

Bill No. - 2022

By-law No. L.-131(__)-__

A by-law to amend By-law No. L.-131-16 entitled "A by-law to provide for the Licensing and Regulation of Various Businesses" to provide for the deletion of an Adult Live Entertainment Parlour location at 2010 Dundas Street and to substitute it with a new Adult Live Entertainment Parlour location at 238 Dundas Street.

WHEREAS the Municipal Council of The Corporation of the City of London wishes to amend By-law No. L.-131-16, as amended, entitled "A by-law to provide for the Licensing and Regulation of Various Businesses" to provide for the deletion of an Adult Live Entertainment Parlour location at 2010 Dundas Street and to substitute it with a new Adult Live Entertainment Parlour location at 238 Dundas Street;

AND WHEREAS section 5(3) of the *Municipal Act, 2001* S.O. 2001, c.25, as amended, provides that a municipal power shall be exercised by by-law;

NOW THEREFORE the Municipal Council of The Corporation of the City of London enacts as follows:

1. The Business Licensing By-law No. L.-131-16, hereby amended by deleting "Schedule 3A, Adult Live Entertainment Parlour Locations, Municipal Address: 2010 Dundas Street, Map 3" in its entirety and replacing it with the attached "Schedule 3A, Adult Live Entertainment Parlour Locations, Municipal Address: 238 Dundas Street, Map 3".
2. This by-law shall come into force and effect on the day it is passed.

PASSED in Open Council on MONTH / DAY, 2022.

This by-law shall come into force and effect on the day it is passed.

PASSED in Open Council on Month, Day, 2022

Ed Holder
Mayor

Michael Schulthess
City Clerk

SCHEDULE 3A

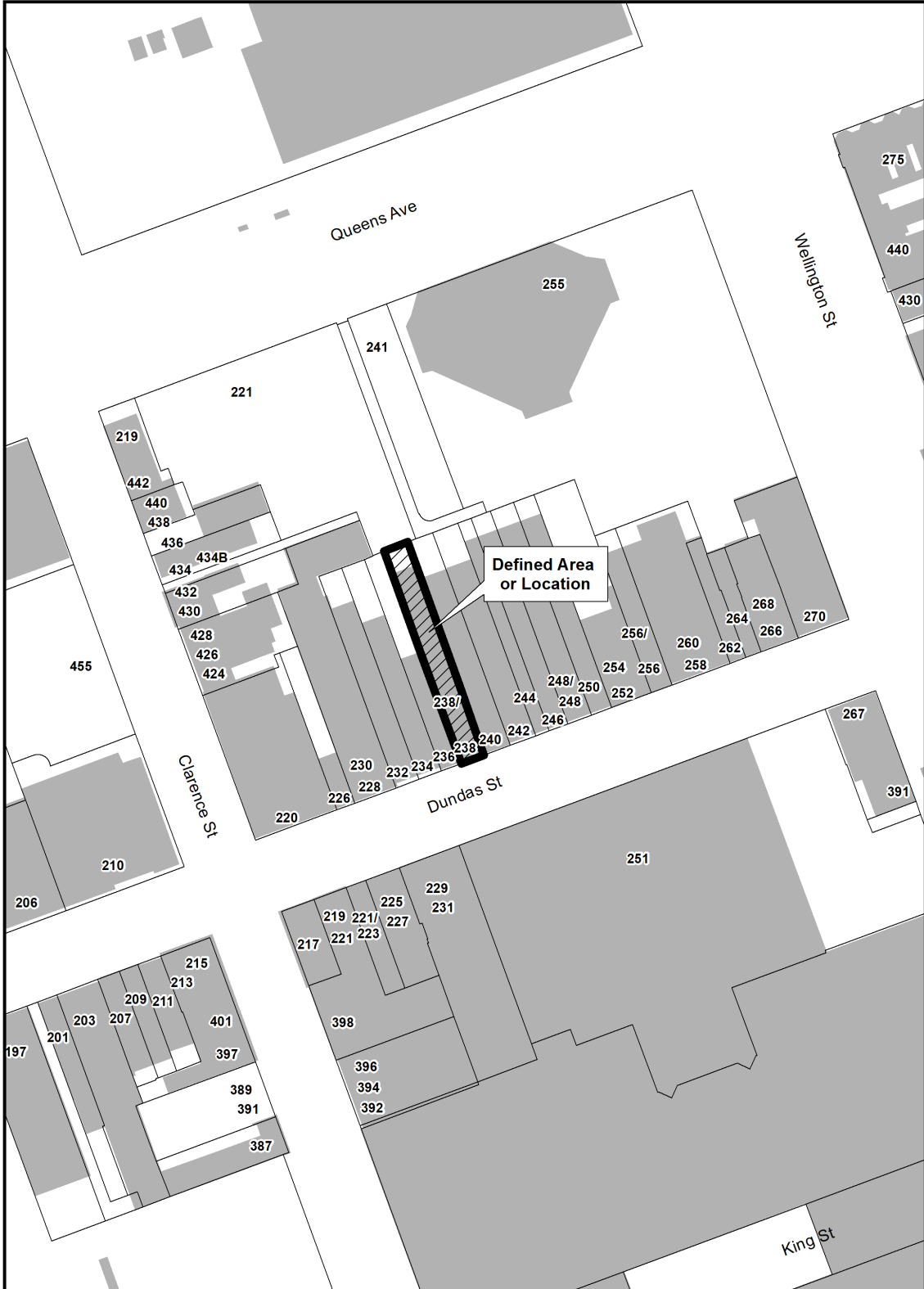
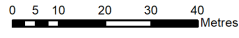
ADULT LIVE ENTERTAINMENT PARLOUR LOCATIONS

MUNICIPAL ADDRESS: 238 Dundas Street

MAP 3



Defined Area or Location



Appendix 'B' – Notice of Application

Attachment 1 - Notice of Application (.pdf)



300 Dufferin Avenue
P.O. Box 5035
London, ON
N6A 4L9

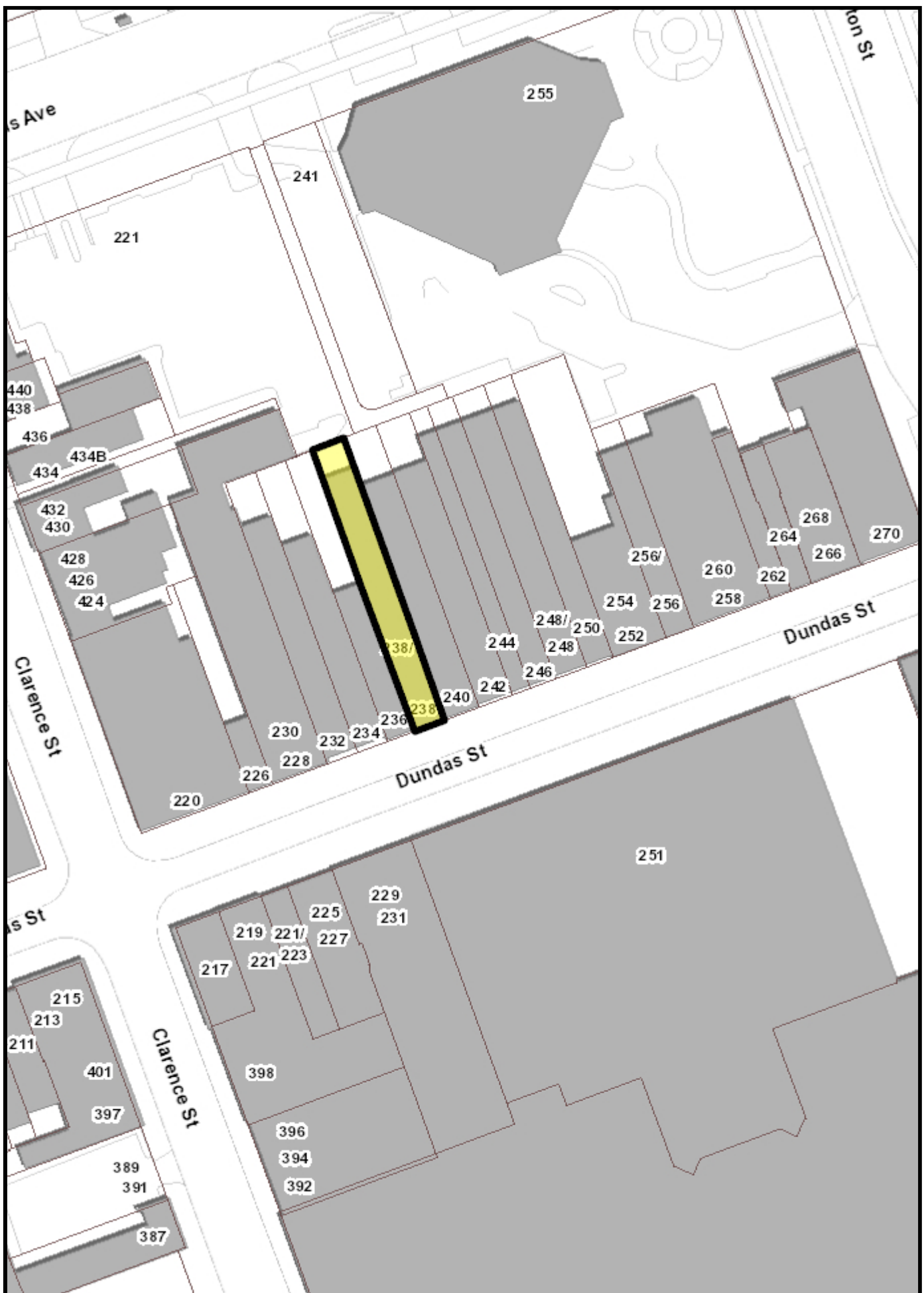
E. Ling
Tel: 519-661-2489 x.2786
Email: eling@london.ca
Website: www.london.ca

January 25, 2021

NOTICE OF BUSINESS LICENCE AMENDMENT: Adult Live Entertainment Parlour Relocation Request

TAKE NOTICE that Municipal Compliance has received an application to relocate an *Adult Live Entertainment Parlour* from the existing address at 2010 Dundas Street to a new location at 238 Dundas Street. Pursuant to Schedule 3, Part 9 of the Business Licensing By-law L.131-16, City Council may consider applications to substitute a new location for an existing location of an *Adult Live Entertainment Parlour*. We are advising you of this application to invite your comments now and inform you that there will be a future public meeting of the Community and Protective Services Committee on the matter.

APPLICANT:	Paris Clubs Corporation
LOCATION:	Moving From: 2010 Dundas Street, London, ON (Ward #2) Moving To: 238 Dundas Street, London, ON (Ward #13)
PURPOSE AND EFFECT:	The applicant seeks to relocate an existing licensed <i>Adult Live Entertainment Parlour</i> from 2010 Dundas Street to 238 Dundas Street.
HOW TO COMMENT:	COMMENTS ARE DUE BY THURSDAY, FEBRUARY 24, 2022. Any submissions with respect to this application must be made in writing, by mail or email: Mail: Municipal Compliance, Attention: E. Ling Re. Adult Entertainment Parlour Relocation 7th Floor, City Hall, 300 Dufferin Ave., London, ON, N6A 2L9. Email: eling@london.ca
FOR MORE INFORMATION	This file has been assigned to E. Ling of Development and Compliance Services, Municipal Compliance. All inquiries and comments can be sent to him at eling@london.ca , or to the mailing address above. A map showing the location of the land which is the subject of the application is attached to this Notice.
PUBLIC PARTICIPATION MEETING	As per Section 3, Part 9 of the Business Licensing By-law, comments, and recommendations regarding the relocation are to be provided to the City of London. As well, Community and Protective Services Committee (CPSC) shall hold at least one meeting that is open to the public for the purpose of affording an opportunity to the applicant, and any other person who attends the meeting, to make oral submissions in respect of the requested relocation. Those who have received this notice by mail will be notified again, by mail, when the meeting is scheduled. The meeting date and time will also be advertised on the City of London's website; www.london.ca
COLLECTION OF PERSONAL INFORMATION	Personal information collected as part of this application will form part of the public comment and may be part of the report or presentation on the subject. Questions about this collection should be addressed to the City Clerks Department, 3 rd floor, City Hall.








Location Map

Project Title: 238 Dundas St - Licensing
 Description: Adult Live Entertainment
 Parlour - Relocation Review

Date: 1/20/2022
 Scale: 1:1000

Legend

-  Subject Site
-  Parks
-  Assessment Parcels
-  Buildings
-  Address Numbers



Appendix 'C': - Comments and Additional Information

Comments Received:

From: [NAME AND EMAIL ADDRESS REDACTED]

Sent: Sunday, February 6, 2022 4:19 PM

Subject: [EXTERNAL] Re: Adult live entertainment parlour relocation request

Good afternoon,

I'm following up from an email I sent to you on February 4th pertaining to the proposed relocation of the live adult entertainment club.

I'm now learning through a CBC article that it was Lavish applying for this so they could host burlesque shows etc.

This is much different than I had originally thought and what was outlined in the notice sent out.

I would like to add that I'm in complete support of this venue as they have been a pillar of the LGBT community for many years. My previously stated concerns do not apply to this type of business. Lavish has not been any cause for concern in the past and brought a lot of wonderful events to the downtown.

I only wish I had known this was the case before sending my email.

Thank you

[NAME REDACTED]

From: [EMAIL ADDRESS REDACTED]

Subject: [EXTERNAL] Paris Clubs Corporation

Date: Wednesday, February 23, 2022 1:29:26 PM

In regards to the application to move an unnamed strip club licence from 2010 Dundas to 238 Dundas these details are not present.

Is Paris Clubs Corporation the former licensee for 2010 Dundas St.? If it has been corporate transfer are the principles the same? Who are the principals?

These questions are important because strip clubs are used to launder cash for bikers and other forms of organized crime.

The facilities at 238 Dundas include a roof top patio. Would this be part of the Strip club?

The news made mention of burlesque shows but that is quite different than a strip licence. Lavish has had burlesque shows, drag shows and the like. A strip club is quite a different show and clientele.

As the application is very short on pertinent details I will be apposed (sic) to the application. It is also a very poor fit for Dundas St. revitalization project funded primarily by the city.

[NAME AND ADDRESS REDACTED]

From: [EMAIL ADDRESS REDACTED]

Subject: [EXTERNAL] 238 Dundas Street
Date: Thursday, February 3, 2022 4:43:47 PM

We are tenants at [ADDRESS REDACTED] and have a small business at [ADDRESS REDACTED]

We were informed by our landlord [NAME REDACTED] about a license application that was filed with the City of London to open an adult entertainment business at 238 Dundas Street.

As residents of downtown London, specifically Dundas Place, we deal with enough when it comes to the homeless, individuals with mental health issues and addicts around the area. Cars are broken into, I'm woken up on a regular basis [LOCALITON REDACTED], and noise from the current business at 238 Dundas. This is all a part of living downtown and as frustrating as it can be it's something we were aware of before moving to the area. Bringing in another strip club to the area will only bring more issues that will make us feel even more unsafe and prevent us from living a comfortable life. This type of industry will only bring further problems when it comes to drugs, fights and prostitution. Not to mention bikers and gangs. And although we don't have an issue with sex workers, we do have an issue with a strip club [REDACTED] and what it will bring.

The city wants to revitalize downtown and create an environment that will bring families to the core. The city has spent millions of dollars in renovating Dundas Street and the Downtown Association has put on some pretty great events so far. The Downtown Business Association does so much for the current businesses and they really want to bring new businesses to downtown. Allowing another strip club to open it's doors on Dundas Place will only prevent people from wanting to come downtown.

We live in a newly renovated apartment and have a great landlord. We get along with all of our neighbors and support the local businesses. We love living downtown and as new business owners in the market we hope to be able to continue living here, however if the city allows this type of business to open it will drive us and many other people away from living in the heart of the city. This would be a shame when it's already difficult to bring people to the area. We truly hope the city will think about the negative impact that this type of business will have on beautiful Dundas Place.

Thank you,
[NAMES REDACTED]

From: Eddy Tony
Cc: [NAME REDACTED]
Subject: [EXTERNAL] Adult Parlour Relocation

Date: Monday, February 7, 2022 3:56:48 PM

Hi E. Ling, thank you for sending the notice of the relocation application.

My name is Eddy Phimprachanh (Eddy Tony Inc), owner of 238 Dundas Street where the application for the Adult Parlour is being processed for relocation.

I spoke to [NAME REDACTED] the owner of Lavish and my current tenant.

Under our lease agreement, Lavish is a nightclub/bar/restaurant. And as per conversation with [NAME REDACTED] It will stay that way.

The application for Adult Entertainment Parlour can only be used to host a male revue night.

I reject:

-Turning the business, the name, the primary operation into a stripclub or any form of adult entertainment or service.

I accept:

-Having the ability to host an event that involves sexual nature as a "themed" night of the week.

If this relocation license for Adult Ent Parlour allows for anything beyond what I accept and reject above. Please inform me.

--

"Whatever you focus on grows."

Eddy Tony

www.eddytony.com

**Appendix 'C' Comments and Additional Information,
Attachment 1 – Jonathon Gallery Letter (.pdf)**



Jonathon Gallery-Galerie
258 Dundas Street
London, Ontario
N6A 1H3

February 22nd, 2022

Canada Municipal Compliance: Attn: E. Ling
7th Floor, London City Hall
300 Dufferin Ave.,
London, ON
N6A 2L6

Ref: Adult Entertainment Parlour Relocation to Lavish at 238 Dundas St.

Dear E. Ling

Where to start? London has apparently allowed for four strip club licenses. Currently Solid Gold is located across the street suggesting that 50% of the available licenses would be within one city block if this application were to be approved. Regardless of that Dundas Place is an area upon which great hopes have been pinned for the revitalization of Downtown London. It is patently absurd to even consider approval of this application for the following reasons.

1. The London Public Central Library is across the street, a venue that attracts school children from across the city.
2. Public perception of the safety of downtown among Londoners is already at a low ebb and is impacting people coming downtown.
3. There are many permanent residents, many of them single women, now residing in renovated high end luxury apartments above the storefronts between Clarence and Wellington.
4. Many Canadian cities now limit strip club establishments to industrial areas so why would London allow a strip club in an area touted as a tourist mecca or is sex tourism a new goal?

5. Within a ten minute walk there are five schools: Beal Secondary, Catholic Central, Fanshawe, London Central and Lord Roberts french Immersion and Western has just acquired property at Queen and Talbot making the number of young people using downtown enormous.
6. Pa Kua Martial Arts School with many young students is at 342 Dundas
7. Yoga One Studio at 246 Dundas has a multi generational clientele.
8. Attic Books at 240 also has a large youth clientele
9. There are many family friendly attractions downtown; Budweiser Gardens, Heroes, Museum London, Covent Garden Market.

Furthermore a newspaper article (<https://www.cbc.ca/news/canada/london/lavish-owner-says-he-s-not-trying-to-bring-a-second-strip-club-to-dundas-place-1.6340009>) citing the reason being to bring 'adult based entertainment for the LGBTQ community is a veiled justification to allow for a strip club. I could go on but won't as I am sure you are getting the picture. In the past few years we have endured unending upheaval from construction, Covid pandemisc, burgeoning homeless population. The last thing the neighbourhood needs is a strip club with all the attendant social baggage real and imagined that attends it. I think you'll also find that when the Red Lion became a strip club it was forced to change its entrance off Dundas to Clarence St.

Thank You

Jonathon Bancroft-Snell

519-434-5443

Business Owner

CC.

Mayor E. Holder,

Ryan Craven, Dundas Place Co-Ordinator

John Fyfe-Millar councillor ,

Barbara Maly Downtown LoNdon,

Cheryl Finn Tourism London

Lori Da Silva RBC Place Convention Centre

Tom Bird Landlord

**Appendix 'C' Comments and Additional Information,
Attachment 2 – London Abused Women's Centre Letter (.pdf)**



797 York Street – Unit 5
London ON N5W 6A8
t. (519) 432-2204
f. (519) 679-3918
info@lawc.on.ca

Providing counselling, advocacy and support for abused women.

February 24, 2022

Mr. Ethan Ling
Municipal Compliance
City of London

Re: Adult Live Entertainment Parlour Relocation

The London Abused Women's Centre has been providing services to women and girls who have been exploited and trafficked for nearly 25 years. Since 2015, LAWC has supported over 2,800 women and girls who have been trafficked and over 1,800 women and girls who are at risk of being trafficked with long-term, trauma-informed, woman-centred counselling, advocacy and support. These numbers include at least 68 girls who report they were under 18 years old.

Sex trafficking is a form of sexual exploitation that can include recruiting, obtaining, or providing a person for the purpose of sex. In Ontario, sex trafficking is the most commonly reported form of human trafficking.¹

The demand for paid sexual services fuels the growth of trafficking and exploitation of our most vulnerable populations. Victims of sex trafficking are often lured or coerced into the commercial sex industry.

Two-thirds of all trafficking in Canada originates in Ontario.² London is a hub for sex trafficking because it is the first large city located between Detroit/Windsor and Toronto with easy access from the 401 into hotels and motels.

While trafficking affects all demographics, traffickers frequently target individuals who lack strong support networks, are facing financial strain, have experienced violence in the past, or who are marginalized by society. Without adequate community support, youth who are LGBTQ2+ may be at particular risk for sex trafficking.³

Many LGBTQ2+ youth face challenges during their teenage years and into early adulthood. There are many misconceptions, there is abuse from family and peers. They also face higher rates of discrimination and violence. LGBTQ2+ youth experience homelessness at disproportionately high rates as a result of oppression and discrimination in society and in their homes.⁴

¹ <https://www.ontario.ca/page/about-human-trafficking>

² <https://www.canada.ca/en/public-safety-canada/campaigns/human-trafficking.html>

³ <https://polarisproject.org/wp-content/uploads/2019/09/LGBTQ-Sex-Trafficking.pdf>

⁴ <https://www.lawc.on.ca/wp-content/uploads/2018/04/Youth-Package-Phoenix.pdf>

Just this past week, the London Police Service launched an Anti-Human Trafficking Campaign using the hashtag #KnowHumanTrafficking to help raise awareness and educate the community on the risks and warning signs associated with human trafficking. The goal is to reduce victimization and revictimization through public education, promotion, and encouragement of public engagement.

The City of London has a pillar in the strategic plan to create a safe London for women and girls with the outcome being to enhance the potential for women and girls to live safe lives. There has been a commitment from the City of London to apply a trauma and violence informed lens to the strategic plan, ensuring that an intersectional approach is applied to address violence against women and girls in our community.

Again, the demand for paid sexual services fuels the growth of trafficking and exploitation of our most vulnerable populations. There are members of our community who are at risk of violence for no other reason than who they are. Approving this application for relocation would be a mistake.

To that end, the London Abused Women's Centre recommends the London City Council not only deny the application for relocation and revoke the license completely.

London City Council has a responsibility to make decisions based on the best interests of all individuals especially those who are most vulnerable.

Thank you,

A handwritten signature in black ink that reads "JDunn". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jennifer Dunn
Executive Director
London Abused Women's Centre