Licensed or Licentious? Examining Regulatory Discussions of Stripping in Ontario

Tuulia Law*

Abstract

This paper reflects on the moralization of the sex industry and the implications thereof in a case study of erotic dance in Ontario since the year 2000. It examines how subjects, objects, and practices are discursively formed and moralized in regulatory discussions of stripping and how subjects engage in and resist moralization. This article argues that in spite of the development of a labour discourse, a discourse moralizing stripping as prostitution, which is, in turn, framed as harmful and deviant, continues to inform regulation.

Keywords: erotic dance, municipal regulation, moral regulation, sex work, discourse, stripping

Résumé

Le présent document se penche sur la moralisation de l'industrie du sexe ainsi que sur les implications qui en découlent dans une étude de cas portant sur la danse érotique en Ontario depuis l'année 2000. Il examine comment les sujets, les objets ainsi que les pratiques sont perçus et moralisés lors de débats sur la réglementation de l'effeuillage, puis comment les sujets se comportent et résistent à une telle moralisation. Cet article soutient que, malgré l'élaboration d'un discours relatif au travail, le discours moralisateur interprétant l'effeuillage comme un acte de prostitution, c'est-à-dire un acte nuisible et déviant, continue d'influer l'élaboration de la réglementation.

Mots clés : danse érotique, réglementation municipale, contrôle des mœurs, travail du sexe, discours, effeuillage

Introduction

In examining how discourses form the objects of which they speak (Foucault 1972), we are also asking how objects are discursively situated in relation to one another. An analysis of moral discourses in particular allows us to see how some

* I would like to thank Drs. Chris Bruckert, Prashan Ranasinghe, and Samia Chreim as well as the editors and reviewers of this journal, whose insightful comments helped improve the clarity, contribution, and scope of this article.

Canadian Journal of Law and Society / Revue Canadienne Droit et Société, 2014, Volume 30, no. 1, pp. 31–50. doi:10.1017/cls.2014.25

objects, subjects, and practices are met with approval while others are moralized as wrong or harmful (see Corrigan 1981; Hunt 1997). This article examines how various subjects, objects, and practices are moralized in a Foucaultian archaeology charting the development and interplay of discourses concerning the regulation of erotic dance in Toronto and Ottawa between 2000 and 2012. Across these discussions, government officials moralized erotic dance by associating it with prostitution[1] and trafficking, while strip club owners and dancers both attempted to displace moralization on to "dirty" dancers and erotic massage parlours and articulated stripping as labour. This article considers how these social actors and groups participated in and resisted moralization to reflect on the production and consequences of discursive constructions of erotic dance (and sex work in general) as harm, deviance, and labour. It explores the transformation of erotic dance from an issue of social and attitudinal harm to one of individual and international harm (trafficking) and also considers the concurrent decrease in communities' objections to lap dancing. I argue that the continued moralization of erotic dance has impeded the proliferation and influence of a labour discourse that could lead to sensible regulatory solutions for the adult and sex industries.

Setting the Stage: Sociolegal Context and Literature Review

The debut of lap dancing in the 1990s introduced touching between dancers and patrons, provoking heated debates among industry stakeholders and communities across Ontario as well as regulatory efforts to eradicate it. As lap dancing spread, dancers were transformed from waged performers to independent contractors who earn their income almost solely by soliciting customers for lap dances (Bruckert and Dufresne 2002). Together, these changes rendered strippers' work not only financially unstable but also legally precarious.

The 1990s were rife with uncertainty as to precisely what was permitted in a lap dance (Bruckert 2002; Lewis 2000). This uncertainty even reached, but was not resolved by, the Supreme Court of Canada. In 1997, the SCC ruled in *R v Mara* that the "sexual touching between dancer and patron" (para 35) during a lap dance in a Toronto strip club was indecent, on the basis that it "is harmful to society in many ways: it degrades and dehumanizes women; it desensitizes sexuality and is incompatible with the dignity and equality of each human being; and it predisposes persons to act in an antisocial manner" (*R v Mara* 1997, para 12). In noting the risks dancers faced "from the activities' similarities to prostitution" (para 37), the court also equated prostitution to individual harm. However this was "not a central consideration" in the court's finding of indecency; instead, the judges highlighted "the attitudinal harm on those watching the performance as perceived by the community as a whole" (para 37).

[1] Although I agree that the term "sex work" more meaningfully acknowledges work in the sex industry as labour, I use the term "prostitution" throughout this paper to: (1) avoid confusion between different sectors of the sex industry, (2) avoid classifying erotic dance as sex work, since not all strippers identify as sex workers (see Bruckert 2002), and (3) retain the language used in the regulatory discussions.

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

Two years later, the Supreme Court acquitted the owner of a Quebec strip club of a bawdy house charge for allowing lap dancing in *R v Pelletier*. Unlike Mr. Mara's strip club where touching had occurred in plain view of other patrons, the lap dances at Mme. Pelletier's club had been performed in partially enclosed booths (*R c Pelletier* 1993). The majority (3) of Supreme Court justices agreed with the trial judge's assessment that because the touching had occurred out of public view and could thus be considered private, it was not an indecent act (*R v Pelletier* 1999; *R c Pelletier* 1993). Moreover, the trial judge had interpreted the absence of complaints by other customers and neighbourhood residents as an indication that the activities in question did not exceed community standards of tolerance (*R c Pelletier* 1993). However, *Pelletier* was not a complete break from *Mara*: two justices dissented, characterizing the behaviour as "sexual contact" that was "not private in nature" and thus indecent (*R v Pelletier* 1999, para 4).

Concurrent to the courts' deliberations, municipalities in Ontario banned lap dancing indirectly with bylaws against touching, which dancer advocacy groups were instrumental in crafting (Bouclin 2004). In 1996, Ottawa prohibited:

> any adult entertainment performer providing live entertainment or services designed to appeal to erotic or sexual appetites or inclinations to touch or be touched by or have physical contact with any other person in any manner whatsoever involving any part of that person's body. (Bylaw 2002-189, s 20)

Predating Ottawa's no-touch provisions by one year, Toronto's bylaws also prohibited all physical contact until 2013, when (as we will see) they were slightly narrowed. Although Toronto, Ottawa, and other municipalities in Ontario justified their prohibition of touching on the basis of health risks, Bruckert and Dufresne (2002) argue the bylaws derived from a discourse of morality (see also Bruckert 2002; Lewis 2000).

Moral suspicion is also visible in other Adult Entertainment Parlour (AEP) bylaws that facilitate surveillance of dancers and patrons (Bruckert and Dufresne 2002). In Ottawa, club floor plans must be approved by municipal and police officials (Ottawa bylaw 2002-189), and Toronto's bylaws required (from 1996 to 2013) that private dances be performed in an area within view of the stage (*Toronto Municipal Code* 2010). Another way that municipalities surveil strip club actors is through licensing. While both cities require owners and operators to obtain annual licenses, only Toronto licenses strippers. Licenses are disproportionately costly, subject to review by the police, and refused if the applicant has been convicted of prostitution-related offenses (Toronto 2012a; Ottawa 2013). In short, the bylaws appear to be engineered for preventing prostitution and prostitution-like activities (cf. Jackson 2011).

Scholars have also identified a moral subtext in the framing of strip clubs as potentially harmful to neighbourhoods and their residents, particularly women and girls (Hubbard 2009; Hubbard and Colosi 2012; see also Bouclin 2009). Community groups have linked strip clubs to trafficking (Hubbard 2009; Weitzer 2012), increased crime rates, and decreased property values (Frank and Carnes 2009; Hanna 2005; Hubbard 2009; Hubbard et al. 2008). Such notions of harm have informed multiple levels of regulation (van der Meulen and Durisin 2008);

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

municipalities can restrict zoning and the numbers of strip clubs thanks to the *Ontario Municipal Act* (2001). This has enabled Toronto to create a limit of 63 owners' licenses and make them so onerous to obtain or transfer that there are currently only 17 strip clubs in operation (MLS 2012a; *Toronto Municipal Code* 2010). Location restrictions are even more severe in Ottawa, where there are only nine strip clubs (Ottawa bylaw 2002-189).

In spite of these intersecting discourses of prostitution, immorality, crime, harm, and trafficking, Jones et al. (2003) have observed a diversity of opinions about strip clubs, some of which view of them as part of the local economy (see also Hanna 2005). Bruckert and Parent (2007) note that even strippers have been divided on the issue of lap dancing: some found it lucrative and felt in control, while others framed it as prostitution and as such a threat to their wellbeing, sexual health, and physical security (see also Bouclin 2004, 2006; Lewis 2000). Lewis and Shaver's (2006) description of erotic dance as existing in a context of precarious tolerance is then perhaps the most accurate.

Theoretical Framework: Toward an Archaeology of Moral Regulation

As we have seen in the literature, morality has featured significantly in discourses concerning stripping and the regulation thereof. In order to meaningfully address the relationships between, and the transformations of, these discourses over time, I propose an archaeology of moral regulation.

According to Corrigan (1981, 327), moral regulation operates through the "licensing and encouraging of approved forms [of expression] and marginalization (up to and including coercive prohibition) of other forms." As stripping is both licensed *and* marginalized by the state, some aspects of it are subject to moral regulation. Hunt's development of the concept accommodates this nuance:

> Moral discourses link a moralized subject with some moralized object or practices in such a way as to impute some wider socially harmful consequences unless subject and practices are subjected to appropriate regulation. Moral regulation involves 'moralization' rather than 'morality' and thus is relational (whether to others or to the self) in asserting some generalized sense of the wrongness of some conduct, habit or disposition. (Hunt 1997, 280)

Hunt further notes that the ways in which objects or practices are moralized, as "harmful" and therefore "wrong," "[seem] to exhibit a very distinct periodicity" (1997, 295).

However, given the melee of social actors and groups, a chronology would not adequately address the dynamics of regulatory discourses about erotic dance. Foucault suggests that, rather than falling into distinct periods, discursive formations are instead "series full of gaps, intertwined with one another, interplays of differences, distances, substitutions, transformations" (Foucault 1972, 37). This paper, then, follows Foucault's archaeology, which is an attempt to "define the relations on the very surface of discourse" in order to understand how discourses function, exist and coexist, transform and appear in other discourses

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

(Foucault 1989, 45–6). "Discourse" can be understood in this context as "a group of statements which provide a language for talking about—a way of representing the knowledge about—a particular topic at a particular historical moment" (Hall 1992, 291).

If discourses are discontinuous over time, it follows that not all discourses moralize. Moreover, if and how subjects, objects, and practices are moralized may vary between individuals and social groups. Although moral regulation "is never unitary, [and] its agents vary widely" (Hunt 1997, 277), Hunt argues that the "relative positions and resources of participants influence the likelihood of success or failure of the various [moral regulation] projects in play, even though that calculus is more complex than analysis couched in terms of more or less power" (1999, 6). In this regard Valverde and Weir suggest that analyses of moral regulation should focus on the relationship between rule and resistance, keeping in mind "the dialectical interplay between . . . and the internal contradictions within both rulers and ruled" (2006, 82).

Guided by these theoretical strands, I explore the conflicts, convergences, and transformations of discourses articulated by different stakeholders over time. This can be seen as an archaeology of how discourses form and/or moralize subjects, objects, and practices and in turn how subjects both engage in and resist moralization.

Methodology

My archaeology focuses on the years 2000 to 2012 (inclusive), a short yet dynamic period in which many regulatory conversations occurred. Because most[2] of the academic literature on stripping regulation in Ontario examines the period before 2000, my timeframe provides a contemporary contribution to this body of work. My examination of two different cities also allows me to consider regional nuances. Following Foucault, my archaeology looks at discourse via the statement, "a set of signs that can be a sentence or a proposition . . . envisaged at the level of its existence" (Foucault 1989, 55). I examined statements emanating from (or attributed to) the individuals and groups who have participated in discussions about strip club regulation, including club owners, dancers, government officials, and various community representatives. Reflecting this broad range of contributors, I have drawn upon a wide variety of sources, including municipal documents, court records, legislative documents, newspaper articles,[3] and materials issued by stakeholder organizations (the Dancers' Equal Rights Association, the Exotic Dancers Alliance, and one management initiative, the Adult Entertainment Association of Canada). I then analyzed the data using codes emerging from the literature and from the data itself, uncovering five discursive sets. My findings are presented below, followed by a discussion of the themes and lessons from those findings.

---

[2] Bouclin's (2004, 2006, 2009) study of dancer organizing in Ottawa touched on the 2004 bylaw reform.

[3] As a vehicle by which discourses are recorded, circulated, and validated, the media contributes to the archaeology of discourses whether or not the statements therein accurately reflect what contributors actually said (see Hall et al. 1978).

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

Discursive Sets

"They can sugar coat it all they want, but that's sex for sale" (Jaimet 2000b).

After the *R v Pelletier* ruling in December 1999, lap dancing again became the subject of much debate. As the above quotation suggests, most groups characterized it as prostitution. Moreover, dancers, owners, and (in Ottawa) clients were charged with prostitution-related offences in raids carried out throughout 2000.

Residents and representatives of a Toronto suburb were vociferous in their opposition to a proposed "red-light district" (of two strip clubs), which they framed as "morally wrong and bad planning" (Ferenc 2000), and an "open invitation to prostitutes, drug dealers and battling drunks to take over their community" (Swainson 2000). Similarly, an Ottawa borough mayor suggested using the *Ontario Municipal Act* to limit the number of strip clubs in the soon-to-be amalgamated city of Ottawa, and was quoted as saying, "It's a quality of life issue and a community-value issue" (Gray 2000).

Ottawa city officials also framed lap dancing as degrading to women. City councillors instructed police to "stamp out lap dancing," calling it "demeaning" and comparing it to prostitution (Jaimet 2000b). Similarly, the police "[took] the standpoint that any acts committed in these [adult entertainment] parlours may very well exceed the standard of what the community is prepared to tolerate" (Stonehouse 2000). Shortly thereafter, police conducted a "sweep" targeting both strip clubs and street-based sex work (Campbell 2000).

These interconnected discourses associating lap dancing with harm, prostitution, and crime materialized in Ottawa's revised AEP bylaw, which contained a requirement that "the Chief of Police has reported in writing as to the good character of the applicant" for owner, operator, and "attendant" (stripper) licenses (Ottawa bylaw L6 2000, s 1). Although this provision came into force on December 20, 2000, the city of Ottawa amalgamated its municipal administrations on January 1, 2001, and attendant licensing was dropped out of concern for dancers' privacy (*AEAC et al. v Ottawa* 2005a).

Even some strippers framed lap dancing as prostitution. In Ottawa, this discourse was mobilized by the Dancers' Equal Rights Association (DERA), a dancers' group founded in 2000 that claimed lap dancing

> creates a hostile division between the women who choose to lap dance (referred to as "Dirty Girls") and the women who remain traditionally "visual only" (referred to as "Good Girls"). The "Dirty Girls" end up making more money and the "Good Girls" make much less, this puts financial pressure on the "Good Girls" to lap dance. If the women were not being financially exploited by the owners there would be no lap dancing or "private areas" as the women would simply refuse to engage in high-risk activities because they would have a choice. (DERA 2002, 8)

DERA's differentiation between "Good Girls" and "Dirty Girls" casts the latter as deviant while the assumption that no one would freely choose to lap dance diminishes their capacity for agency and moralizes lap dancing as harmful to dancers' health, safety, and financial security. Interestingly, Ottawa newspapers featured only strippers who were opposed to lap dancing, describing the practice as "unsafe,

unhygienic and demeaning" and "prostitution" (Stonehouse 2000; see also Jaimet 2000a and b). By contrast in Toronto, where the latest organization in the region, the Exotic Dancers Alliance, was in decline (Bouclin 2004), strippers' reactions to the return of lap dancing were not apparent in the media.

Strip club management in the two cities also responded to *Pelletier* slightly differently. In Ottawa, some club owners threatened to challenge the bylaws (Stonehouse 2000), while others claimed not to support lap dancing but suggested that some dancers might allow touching (Jaimet 2000a and b). Management in Toronto appears to have made no such claims. However, bawdy house charges against two strip club operators were dropped in 2003 (see *R v DiGiuseppe* 2008).

Toronto police also charged some club owners with procuring and some migrant strippers with immigration violations in a year-long investigation into trafficking and organized crime in strip clubs, called Project Almonzo. The project was lauded as "successful" in a government-funded report (McDonald et al. 2000, 68).[4] Concurrently, Citizenship and Immigration Canada (CIC) began "scrutinizing 'burlesque entertainer' [erotic dancer] applications more closely" (Jimenez and Bell 2000) "after discovering some [migrant dancers] were prostitutes" (Bell and Jimenez 2000). Thus, it appears that authorities mixed concern about harm to foreign women with blame and punishment for prostitution (cf. O'Connell Davidson 2006).

From 2000 to 2002, then, municipal councils and police as well as some Toronto area residents and Ottawa dancers moralized lap dancing as harmful to the "community" and to women, their health and safety, via discourses characterizing it as prostitution. In turn, strippers who chose to lap dance were framed as deviant, "dirty," "prostitutes."

From Prostitution to Labour Concerns

Although DERA had positioned lap dancing as a threat to strippers' health and safety, this fledgling discourse about labour conditions began to break away from moralization in 2004 and 2005. In Ottawa, this was initiated in the bylaw harmonization process, which reopened the discussion on licensing of strippers. Newspaper reports about the proposed licensing changes featured dancers' and club owners' concerns about privacy, stigma, and cost and their objections to regulating stripping differently than other service jobs (Corbett 2004; Gray 2004). Dancer licensing was finally removed from the city's agenda after DERA, accompanied by club owners, sympathetic community groups, and a large number of unaffiliated dancers, voiced objections at a municipal hearing (Bouclin 2004; Deputy City Manager 2004).

Although strippers were united in objecting to licensing, this was not the case with other provisions of Ottawa's AEP bylaw. Despite mentioning some dancers' financial concerns, DERA had not challenged the no-touching provision, instead affirming its purpose "to protect the health and safety of the dancers and to

[4] Ultimately, however, "all charges that were laid [during Project Almonzo] were withdrawn or stayed" (*Locomotion Tavern v Ontario* 2010).

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

minimize nuisances" (EPSC 2004, np). These divisions became more apparent in 2005, when a group of Ottawa strip club owners (represented by the Adult Entertainment Association of Canada, or AEAC) and dancers mounted a court challenge arguing the provisions forbidding close contact touching and champagne rooms were detrimental to their business (*AEAC et al. v Ottawa* 2005b). In this challenge, 45 strippers insisted that "they were denied any meaningful consultation in the by-law approval process . . . and they dispute the health and safety and public protection concerns which the City has identified as its rationale for the by-law amendments" (*AEAC et al. v Ottawa* 2005a, para 4). These dancers also argued that DERA was "not representative" and "a group of ex-performers who had not lap danced and were not reflective of the views of current dancers" (*AEAC et al. v Ottawa* 2005b, para 7). However, in finding that the city's consultation with DERA was fair, in "the absence of any other organized group to speak for [dancers]" (*AEAC et al. v Ottawa* 2005b, para 13), the judge did not recognize strippers who supported lap dancing. The challenge failed, and the bylaws remained unchanged even after an appeal in 2007 (see *AEAC et al. v Ottawa* 2007).

Unlike the debate in Toronto in 2000, "there was no feedback from the general public" (EPSC 2004) regarding Ottawa's harmonized AEP bylaws, save for one letter to the editor insisting strip clubs "provide legal entertainment and should be registered as any other (liquor-licensed) establishment" (Kolbuszewski 2004). The city council nonetheless incorporated additional location restrictions and the prohibition of "nude, naked, topless, bottomless, sexy and other words or pictures or symbols of like meaning" from strip club signage into the harmonized bylaw (Ottawa bylaw 2004-353, s 1(b)). Thus, in spite of the lack of public objections, the city council continued to moralize stripping by designing bylaws to prevent the ostensible social harm that the presence of additional strip clubs and any overt mention of nudity and sexiness might cause.

By contrast, newspapers began covering labour conditions, featuring a stripper advocating for improved working conditions (Tralee 2004), a study about unfair labour practices in the sex industry (see Maticka-Tyndale 2004), and a report on exploitative working conditions that addressed stripping alongside other occupations (Danese 2004; Greenaway 2005; Greenberg 2005; see Law Commission of Canada 2004). However, the labour minister of Ontario rejected a call to boost inspections at strip clubs (Greenberg 2005). Thus, provincial and municipal governments and courts seemed reticent to relinquish moral concerns when the media and the public were beginning to acknowledge erotic dance as labour.

A New Threat to the Community: Body-rub Parlours

Concurrently, Toronto city council discussions of adult businesses, which had heretofore been predominantly concerned with strip clubs (or AEPs), were expanding to include what they perceived as an emerging threat to the community—body rub parlours (or BRPs), which offer closer contact and more sexual services than strip clubs generally do (Lewis and Shaver 2006; van der Meulen and Durisin 2008). Strip club owners voiced such anxiety to city administration that the AEAC was invited to take part in a municipal "task force to develop licensing criteria, standards and regulations for Holistic Establishments ('illegal body-rub parlours')"

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

(Toronto 2004, 63). After a staff report framed BRPs as "illegal enterprises" that "are a nuisance to the neighbourhood" (PTC 2005b, 2), the city council decided to limit their allowable hours of operation (PTC 2005a) and also made holistic establishments, body-rub parlours and adult entertainment parlours into distinct business categories, in an effort to safeguard the "reputation [of other businesses] . . . and public health and safety" (Toronto bylaw 719-2005: 1). The latter was apparently a concern to prevent harm to befuddled neighbourhood residents looking for holistic, not sexual, services (cf. van der Meulen and Durisin 2008).

In that same year, however, Toronto councilors decided to increase the police budget to fight drugs ("grow-ops"), child pornography, and "gangs," agreeing that the "hiring of 200 more police officers over a five-year period be funded by an equivalent increase in the licensing fees in massage parlours and adult entertainment businesses" (Toronto 2005a, 93). Although this municipal edict evinces a persistent link between strip clubs, crime, and social harm, AEPs now seemed a lesser target as compared to BRPs. Councilor Howard Moscoe was quoted as saying that he was no longer concerned about prostitution in strip clubs: "it's passed on to illegal body-rub parlours" (McGinn 2007). The AEAC endeavoured to contribute to this shift, telling the media that "illegal massage parlours" were threatening their business (Popplewell 2008) and later recommending a definition to city council of prohibited sexual activities for erotic massage parlours in order to facilitate bylaw infraction charges against them (AEAC 2009b).

Unlike Toronto, Ottawa grouped BRPs, strip clubs, and adult entertainment stores together as "Adult Entertainment Establishments" (EPSC 2005). This appears to have propelled strip club owners to try to distance themselves from erotic massage parlours both physically and conceptually. After the city council struck one strip club from Ottawa's list of permissible establishments in 2007, the AEAC demanded increased surveillance, fewer licenses, and reduced hours for massage parlours as well as a distance of 1,000 metres between BRPs and strip clubs (CPS 2007). The city council complied, and licensing committee minutes show numerous bawdy house charges and bylaw infractions at massage parlours, but not at strip clubs, in 2008 and 2009. Thus, between 2004 and 2009, strip club owners in both Ottawa and Toronto seized an opportunity to redirect moralization and discourses of deviance and criminality away from themselves and toward an object more closely associated with prostitution: erotic massage parlours.

Targeting Trafficking or Targeting Strippers?

At the same time as municipal suspicions about prostitution were shifting toward erotic massage parlours, officials in Toronto were becoming increasingly concerned about trafficking in strip clubs. Framing migrant strippers as victims of exploitation, the trafficking discourse exploded with the Sgro ("Strippergate") scandal in 2004 and 2005, in which the media and opposition politicians accused Judy Sgro, the immigration minister at the time, and the federal Liberal Party of facilitating trafficking through the foreign exotic dancer visa program (see Law 2012). The topic of trafficking began to influence the Toronto city council in June 2004, when councilor Peter Milczyn motioned that the federal government be "requested to tighten immigration policies to no longer grant work visas to exotic

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

dancers" (Toronto 2004, 62). Although this particular motion was dropped, immigration and trafficking concerns subsequently informed the city council's development of protocols and strategies regarding the sex industry (see Toronto 2004; Toronto 2005b).

Even though the Liberals had significantly reduced the number of visas granted to foreign dancers in 2004 (Library of Parliament 2007), their Conservative successors further embraced the trafficking discourse with the introduction of Bill C-57 (2007), which aimed "to protect foreign nationals who are at risk of being subjected to humiliating or degrading treatment, including sexual exploitation" (1.4) by refusing them entry into Canada. According to Conservative immigration minister Diane Finley, the bill "was introduced to preclude situations in which temporary workers, particularly exotic dancers, may be exploited or become victims of human trafficking" (Library of Parliament 2007, 2).

In response to Bill C-57, both migrant and Canadian dancers voiced their objections to journalists, insisting that "work[ing] as an exotic dancer is not humiliating or degrading" (Wattie 2007) and that "we work hard to make the money to make something of ourselves" (Taylor 2008b). The AEAC and "dozens of dancers" also voiced their disapproval of the bill at Toronto City Hall (Wattie 2007). In addition, a variety of sex worker and other advocacy groups argued that Bill C-57 "may harm the very people it is trying to help by driving foreign exotic dancers into underground establishments where they will be beyond the reach of those monitoring workplace health and safety standards or . . . other forms of exploitation" (Library of Parliament 2007, 9). Agustin (2007, 8) describes such legislation as "isolationist immigration policy" aiming to manage and control vulnerable, poor, and undocumented people, which in effect reproduces their marginalization. Similarly, academics have argued that state-sponsored antitrafficking measures merely condemn sex work rather than meaningfully helping victims of trafficking, of whom they identify very few (O'Connell Davidson 2006; Weitzer 2012).

Although Bill C-57 did not pass into law, the government continued to place restrictions on migrant dancers (Library of Parliament 2007), in response to which club owners claimed to be suffering from a labour shortage (Jimenez and Campbell 2004; Popplewell 2008; Taylor 2008a and b; Wattie 2007). The AEAC also insisted club owners monitored migrant workers, by "work[ing] with police to clean up the seedier aspects of the business, and [issuing] a brochure in five languages advising women of their workplace rights and reminding them that sex is prohibited in clubs" (Jimenez and Campbell 2004). Just as some owners in Ottawa had distanced themselves from "dirty" dancers a few years earlier, it seemed the AEAC was attempting to displace moralization onto strippers, at a time when the federal government (or at least the media) suspected strip club owners of having connections to trafficking and organized crime ("Less than Meets the Eye" 2008).

In spite of dancers' attempts to assert their agency as workers and club owners' efforts to salvage their reputation, politicians continued to moralize stripping as coercive and exploitative by associating it with trafficking. They also presented it as deviant, by framing it as an undesirable job. Newspaper reports quoted the federal minister of human resources as contrasting stripping to "family values and hard working Canadians," and the Ontario minister of training as saying he "[did] not

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

believe provincial government employees should counsel clients to train for a job as an escort or table dancer" (Whittington 2010, A15). Subsequently, the federal government resurrected Bill C-57 as a part of Bill C-10 (which became law in 2012), as a measure to protect "uniquely vulnerable young women" from "human trafficking" (Kenney and Finley 2012).

The Toronto Bylaw Review: A Cacophony of Discourses

Unlike their federal and provincial counterparts, Toronto city councilors became more willing to listen to dancers and club owners. In 2009, the AEAC requested that the municipality conduct "an open consultation session for the industry" about the AEP bylaws (AEAC 2009a), followed by an invitation for a tour of local strip clubs (Anonymous 2009a). Although councilor Gloria Luby told the *Toronto Star* she had "no interest in that particular business" and councilor Doug Holyday said, "I can't think going to a strip club is appropriate" (Anonymous 2009a), three other councilors accepted the AEAC's invitation and were ridiculed in the media for doing so (Anonymous 2009a and b; Hanes 2009).

The AEAC continued to ask the city council to review and clarify the bylaws, to no avail (Toronto 2010). Then in 2012, to enlighten councilors as to what went on at their clubs, the AEAC provided a pole dancing demonstration at city hall (Alcoba 2012; Rider 2012). Three years after being aggressively uninterested in stripping, councilor Luby was quoted as describing the demonstration as "tasteful" and was "concerned the licences stigmatize women and 'restrictive' rules need to be rethought" while another councilor admitted she had worked as a cage dancer "back in the day" (Rider 2012).

Finally in March 2012, ten years after a city council committee had admitted the bylaws were "generally violated" (PTC 2002, 13), Toronto began to review its regulatory approach to erotic dance. As part of this endeavour, city staff undertook a report that solicited feedback from strippers, the police, and the public to evaluate the no-touch, dancer licensing, and view-from-the-stage provisions. The AEAC had submitted recommendations to refine the first provision to only prohibit contact of "sexual" body parts and remove the other two (MLS 2012b). Subsequent to a consultation for industry stakeholders, in which 20 dancers had participated and in which

> the AEAC presented staff with a petition signed by over 300 entertainers in support of its three recommendations . . . staff received several telephone calls from individuals who identified themselves as burlesque entertainers and who claimed that in many instances the petition was not signed voluntarily. (MLS 2012b, 35)

City staff were similarly suspicious about a survey sent to dancers, as

> approximately 111 surveys out of 150 [returned] . . . appear to have been completed in the same handwriting, have nearly the same or similar answers to most questions, all arrived in envelopes bearing an address label in the same format, and nearly all of them declare support for the recommendations submitted by Myron W. Shulgan, a solicitor representing the AEAC. (MLS 2012b, 35)

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

This suspicion was substantiated by "unsolicited information" to city staff indicating that some clubs had posted a notice requesting dancers bring in their surveys so that "management can help to fill it out properly" (MLS 2012b, 35).

In keeping with the observations of Bruckert and Parent (2007), Lewis (2000), and Bouclin (2006, 2009), dancers (who had completed their own surveys) espoused diverging perspectives. With regard to the no-touching bylaw, their opinions ranged from "Dancers are comfortable enough to say whether they want contact or not, we are not animals or children" to "touching leads directly to prostitution" (MLS 2012b, 41–43). Similarly, some dancers framed their work as sex work, but others carefully distinguished it from prostitution. At the same time, many acknowledged that touching is common in lap dancing and important to their financial wellbeing (MLS 2012b). Dancers also articulated consent and agency in relation to financial and labour concerns, and it was these issues that were highlighted in newspaper coverage (see Doolittle 2012; DiManno 2012).

As to whether to retain dancer licensing or replace it with a registry administered by the clubs, dancers were also divided. Those who objected to the registry system did so out of a concern for their privacy, but unlike Ottawa dancers in 2004, they worried more about club management having access to their personal information than about the city having it (MLS 2012b).

The Toronto police, however, did not support the elimination of licensing because they were concerned about trafficking (MLS 2012c). Admitting the bylaws were difficult to enforce, they also advocated for "more specific language on what type of contact is prohibited" (MLS 2012b, 73).

As for the public, "[a]n overwhelming majority of all respondents [did] not support the no-touch provisions . . . [or] the unobstructed-view provisions . . . [and] support lap dancing/close contact," while "nearly half" felt that licensing was unnecessary (MLS 2012c, 12). Regardless of whether these respondents comprised a representative sample of Toronto's residents, the absence of other commentary suggests they no longer felt particularly threatened by erotic dance.

The licensing committee concluded that dancer licensing should be kept in place as "a mitigation tool to aid in addressing the growing issue of human trafficking" (MLS 2012c, 33). The city council finally adopted the proposed changes to the view-from-the-stage provision (Toronto 2012b) and refined the no-touch provision (which still prohibits most touching involved in lap dancing) five months later (Toronto bylaw 243-2013). Thus, although the trafficking discourse still informed their understanding of erotic dance, Toronto officials did acknowledge some of the business and labour concerns articulated by club owners and dancers.

Discussion

In the clashing, coalescence, and evolution of discourses outlined above, we have seen moralization and resistance by different actors and groups, whose opportunities and strategies to mobilize their interests have shifted over time. However, in spite of dancers' and club owners' attempts to articulate erotic dance as labour and a business, a discourse moralizing stripping as prostitution has continued as the dominant influence on regulation and has increasingly shifted toward a focus on

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

trafficking. This discussion addresses the changes in the scope and focus of the prostitution discourse, the ways in which different actors and groups engaged in and were affected by moralization and resistance, and the broader ramifications of these developments.

Recalling Hunt's insistence that moral regulation occurs via moral discourses linking moralized subjects, objects, and practices "in such a way as to impute some wider socially harmful consequences" (1997, 280) allows us to see the continuing influence of *R v Mara* (1997), in which the public character of the touching led to a discursive association between lap dancing, social harm, and prostitution. However, the concern with attitudinal harm seems to have waned along with community objections to lap dancing. Concurrently, the harm associated with prostitution has broadened beyond degrading and dehumanizing behaviour to an international issue of harm to individual women, namely, trafficking. This broader discursive scope has, in turn, influenced a wider array of regulation, in areas ranging from stripping to immigration.

Of course, not all of the discourses uncovered in this archaeology constitute moralization. A nuanced labour discourse has developed; however, it has not been coherently or consistently articulated by any one group, and as such it has not unseated the dominant prostitution/trafficking discourse. Even with the increasing visibility of dancers advocating for a labour framework, strippers remain divided on the issue of lap dancing. Although organizations opposed to lap dancing have disappeared, no dancer advocacy groups currently exist in Canada (Gall 2012), and dancers' influence on regulation has decreased. Similarly, club owners' efforts to directly confront the prostitution discourse failed with their bylaw challenge. Over time, however, they managed to leverage their influence on regulation by framing "dirty" dancers as deviant and erotic massage parlours as harmful. However, they were not completely successful in divesting themselves of their deviant status as suspicion of trafficking in strip clubs still lingers. Thus, both club owners and dancers reinforced discourses characterizing the sex industry as deviant and harmful by moralizing conduct they perceived as risky to their business and more closely related to prostitution than their own. Not only did their participation in moralization demonstrate that resistance is not always tantamount to countering the dominant discourse, it also limited the reach of the labour discourse.

Returning to Valverde and Weir's (2006, 82) insistence that analyses of moral regulation efforts can yield insights into resistance movements, we see that, in addition to the disadvantage of dancers' marginal social position (as subjects of moral regulation), the "internal contradictions" in their discourses limited their ability to effect regulatory change. This lack of unity is also visible among people who have been involved in other sectors of the sex industry and whose diversity of experience has resulted in conflicting discourses of labour rights and victimization (see Namaste 2005 and Nagy 2010, respectively). This division, in turn, highlights the incongruities of the labour and trafficking discourses and the danger the latter poses to the former. In conflating sex work with trafficking and condemning it as immoral, coercive, and exploitative, the trafficking discourse effaces the possibility of agency and labour in the sex industry (O'Connell Davidson 2006, 18), and this

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

makes it a very effective strategy of moral regulation. Indeed, Agustin (2007, 105) argues that efforts to save women working in the sex industry have always been about social control, steering nonconforming individuals back into normative social roles so as to mitigate the risk of contaminating "good" citizens. In spite of this, like lap dancing, the labour discourse has continued to spread, now counting some dancers, municipal councilors, and journalists among its supporters.

Conclusion

This article has shown how discursive associations between erotic dance and harm, deviance, prostitution, erotic massage, and trafficking inform multiple levels and modes of regulation. The implications of these moral discourses reach further than regulatory discussions of erotic dance; they have become highly visible in the wake of the *Canada v Bedford* (2013) ruling, in which the laws against bawdy houses, living on the avails of prostitution, and communication for the purposes of prostitution were declared unconstitutional and struck from Canada's *Criminal Code* (pending a one-year suspension of the declaration of invalidity). Although the appellants' argument that the criminalization of prostitution harms sex workers defeated the crown's argument that prostitution is inherently harmful, the *Bedford* challenge maintained a focus on harm in the national conversation about sex work. As with regulatory discussions about stripping, the government's moralization of prostitution in *Bedford* demonstrates a shift away from a discourse of attitudinal harm to the community and toward a discourse of individual harm to exploited, or trafficked, women. In this regard, although *Bedford* struck down the laws that "made clear [Parliament's] intention to eradicate [prostitution]" (*R v Mara* 1997, para 12) and thus undermined the basis on which *Mara* declared lap dancing indecent and therefore harmful, the government's response to the ruling forcefully reiterates the "exploitation that is inherent in prostitution and the risks of violence posed to those who engage in it" (Bill C-36 2014, preamble). In criminalizing the purchase of sexual services (clients) and recriminalizing communicating for the purposes of and (third parties) profiting from, selling sexual services, the bill disregards the Supreme Court's finding that criminalization exacerbates the risks faced by sex workers (see *Canada v Bedford* 2013). That the spectre of trafficking in government discourse may actually increase harm to sex workers is a cruel irony indeed.

While demonstrating that articulating stripping and prostitution as trafficking has been instrumental in maintaining the regulatory status quo, this article has also shed light on the effectiveness (or lack thereof) of various discursive resistance strategies. As we have seen with some dancers' and club owners' objections to lap dancing and erotic massage parlours, displacing moralization onto more "prostitution-like" occupations only reinforces the moral hierarchy enshrined in regulation and reiterates prostitution as a benchmark of harm and deviance. In order to overcome this association with harm, all forms of sex(ual) work would have to be articulated as labour in a cohesive resistance to moral discourses. The mobilization of the issue of consent in service provision at strip clubs represents an important step in this direction as well as a potentially more inclusive, comprehensive, and nuanced basis for regulation.

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

Works Cited

Secondary Material

AEAC. 2009a. Correspondence to Councilor H. Moscoe, January 29. Toronto: AEAC.

AEAC. 2009b. Correspondence to Councilor F. Nunziata, November 6. Toronto: AEAC.

Agustin, L. 2007. *Sex at the Margins: Migration, Labour Markets and the Rescue Industry*. New York: Zed Books.

Bouclin, S. 2004. "Organizing resistance: The case of erotic dancers." University of Ottawa.

———. 2006. "Dancers empowering (some) dancers: The intersections of race, class, and gender in organizing erotic labourers." *Race, Gender and Class* 13 (3/4): 98–130.

———. 2009. "Bad girls like good contracts: Ontario erotic dancers' collective resistance." In *Victim no More: Women's Resistance to Law, Culture and Power*, edited by E. Faulkner and G. MacDonald, 46–60. Winnipeg: Fernwood Publishing.

Bruckert, C. 2002. *Taking it off, Putting it on: Women in the Strip Trade*. Toronto: Women's Press.

Bruckert, C., and M. Dufresne. 2002. "Reconfiguring the margins: Tracing the regulatory context of Ottawa strip clubs, 1974–2000." *Canadian Journal of Law and Society* 17 (1): 69–87.

Bruckert, C., and C. Parent. 2007. "La danse érotique comme métier à l'ère de la vente de soi." *Cahiers de recherche sociologique* 43: 95–107.

Corrigan, P. 1981. "On moral regulation: Some preliminary remarks." *Sociological Review* 29 (2): 313–37.

DERA. 2002. *Current Issues Concerning Exotic Dancers in Ontario*. Ottawa: DERA.

Foucault, M. 1972. *The Archaeology of Knowledge*. Translated by A. M. Sheridan-Smith. New York: Pantheon Books.

———. 1989. *Foucault Live*. Edited by S. Lotringer, translated by J. Johnson. New York: Semiotext(e).

Frank, K., and M. Carnes. 2009. "Gender and space in strip clubs." In *Sex for Sale: Prostitution, Pornography and the Sex Industry*, edited by R. Weitzer, 115–38. New York: Routledge.

Gall, G. 2012. *An Agency of their Own: Sex Worker Union Organizing*. Winchester, UK: Zed Books.

Hall, S. 1992. "The West and the rest: Discourse and power." In *Formations of Modernity*, edited by S. Hall and B. Gieben, 275–332. Cambridge: Polity Press/The Open University.

Hall, S., et al. 1978. *Policing the Crisis: Mugging, the State, and Law and Order*. London: Macmillan.

Hanna, J. 2005. "Exotic dance adult entertainment: A guide for planners and policy makers." *Journal of Planning Literature* 20 (2): 116–34.

Hubbard, P. 2009. "Opposing striptopia: The embattled spaces of adult entertainment." *Sexualities* 12 (6): 721–45.

Hubbard, P., and R. Colosi. 2012. "Sex, crime and the city: Municipal law and the regulation of sexual entertainment." *Social & Legal Studies*, online version.

Hubbard, P., et al. 2008. "Away from prying eyes? The urban geographies of 'adult entertainment.'" *Progress in Human Geography* 32 (3): 363–81.

Hunt, A. 1997. "Moral regulation and making-up the new person: Putting Gramsci to work." *Theoretical Criminology* 1 (3): 275–301.

———. 1999. *Governing Morals: A Social History of Moral Regulation*. Edited by C. Arup, M. Chanock, and P. O'Malley. Cambridge: Cambridge University Press.

Jackson, C. 2011. "Revealing contemporary constructions of femininity: Expression and sexuality in strip club legislation." *Sexualities* 14 (3): 354–69.

Jones, P., P. Shears, and D. Hillier. 2003. "Retailing and the regulatory state: A case study of lap dancing clubs in the UK." *International Journal of Retail & Distribution Management* 31 (4): 214–19.

Law, T. 2012. "Cashing in on cachet? Ethnicity and gender in the strip club." *Canadian Journal of Women and the Law* 24 (1): 135–53.

Law Commission of Canada. 2004. *Is Work Working? Work Laws that do a Better Job*. Ottawa: Law Commission of Canada.

Lewis, J. 2000. "Controlling lap dancing: Law, morality and sex work." In *Sex for Sale: Prostitution, Pornography and the Sex Industry*, edited by R. Weitzer, 203–16. New York: Routledge.

Lewis, J., and F. Shaver. 2006. *Safety, Security and the Well-being of Sex Workers: A Report to the House of Commons Subcommittee on Solicitation Laws*. Windsor: Sex Trade Advocacy and Research (STAR).

Library of Parliament. 2007. *An Act to amend the Immigration and Refugee Protection Act*. Ottawa: Law and Government Division.

Maticka-Tyndale, E. 2004. *Exotic Dancing in Ontario: Health and Safety*. Windsor: Sex Trade Advocacy and Research (STAR).

McDonald, L., B. Moore, and N. Timoshkina. 2000. *Migrant Sex Workers from Eastern Europe and the former Soviet Union: The Canadian Case*. Toronto: University of Toronto Centre for Applied Social Research.

Nagy, T. 2010. *Memoirs of a Sex Slave Survivor*. Communication Dynamics.

Namaste, V. 2005. *Sex Change, Social Change*. Toronto: Canadian Scholars' Press.

O'Connell Davidson, J. 2006. "Will the real sex slave please stand up?" *Feminist Review* 83: 4–22.

Valverde, M., and L. Weir. [1988] 2006. "The struggles of the immoral: Preliminary remarks on moral regulation." In *Moral Regulation and Governance in Canada: History, Context and Critical Issues*, edited by A. Glasbeek, 75–84. Toronto: Canadian Scholars' Press.

van der Meulen, E., and E. Durisin. 2008. "Why decriminalize? How Canada's municipal and federal regulations increase sex workers' vulnerability." *Canadian Journal of Women and the Law* 20 (2): 289–311.

Weitzer, R. 2012. "Sex trafficking and the sex industry: The need for evidence-based theory and legislation." *The Journal of Criminal Law & Criminology* 101 (4): 1337–69.

Cases

Adult Entertainment Association of Canada (AEAC) et al. v Ottawa, [2005a] ONSC 16571.

AEAC et al. v Ottawa, [2005b] ONSC 30850.

AEAC v Ottawa, [2007] ONCA 389.

Canada (Attorney General) v Bedford, [2013] 3 SCR 1101.

Locomotion Tavern v Ontario, [2010] ONSC 1184.

R v DiGiuseppe, [2008] ONCJ 126.

R v Mara, [1997] 2 SCR 630.

R c Pelletier, [1993] 2 RCS 932.

R v Pelletier, [1999] 3 SCR 863.

Legislation

Bill C-10 (2012), *Safe Streets and Communities Act*, 1st Sess, 41st Parliament.

Bill C-36 (2014), *An Act to Amend the Criminal Code in Response to the Supreme Court of Canada Decision in Attorney General of Canada v Bedford and to Make Consequential Amendments to Other Acts*, 2nd session, 41st Parliament.

Bill C-57 (2007), *An Act to Amend the Immigration and Refugee Protection Act*, 1st Sess, 39th Parliament.

City of Ottawa, Bylaw No L6 2000 (2000), *Schedule No 27, Relating to Adult Entertainment Parlours*.

City of Ottawa, Bylaw No 2002–189 (2004), *Adult Entertainment Parlours – Schedule 11*.

City of Ottawa, Bylaw No 2004–353 (2004), *A By-law of the City of Ottawa to Amend By-law No. 2002-189 Respecting Regulating, Licensing and Governing Adult \ Entertainment Parlours*.

City of Toronto, Bylaw No 243–2013 (2012), *To Amend City of Toronto Municipal Code Chapter 545, Licensing, Respecting Adult Entertainment Parlours*.

City of Toronto, Bylaw No 719–2005 (2005), *To Amend City of Toronto Municipal Code Chapter 545, Licensing, Respecting Holistic Centres and Practitioners*.

Ontario Municipal Act, SO 2001, c 25.

Toronto Municipal Code (2010), c 545 art 32.

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

Municipal documents

CPS (Community and Protective Services Committee), City of Ottawa. 2007. *Minutes 8*, April 19.

Deputy City Manager, City of Ottawa. 2004. *Report to Emergency and Protective Services Committee*, June 3.

EPSC (Emergency and Protective Services Committee), City of Ottawa. 2004. *Minutes 7*, June 10.

EPSC, City of Ottawa. 2005. *Minutes 16*, August 25.

MLS (Municipal Licensing and Standards), City of Toronto. 2012a. *Review of Adult Entertainment Regulations*.

MLS, City of Toronto. 2012b. *Review of Adult Entertainment Parlour Regulations - Amendments to Toronto Municipal Code Chapter 545*.

MLS, City of Toronto. 2012c. *Review of Adult Entertainment Parlour Regulations - Amendments to Toronto Municipal Code Chapter 545 (Background file 51361)*.

Ottawa, City of. 2013. *Fees for Harmonized Licenses, By-law Services Fees and Charges as of January 1, 2013*.

PTC (Planning and Transportation Committee), City of Toronto. 2002. *Minutes of the Planning and Transportation Committee, Meeting No. 6, May 27*.

PTC, City of Toronto. 2005a. *Minutes of the Planning and Transportation Committee, Meeting No. 10*, November 7.

PTC, City of Toronto. 2005b. *Proposed Amendments to the City of Toronto Municipal Code, Chapter 545, Licensing, Regarding Hours of Operation for Body Rub Parlours*, October 14.

Toronto, City of. 2012a. *Business Licensing Fees*. Municipal Licensing & Standards.

Toronto, City of. 2012b. *Minutes of October 30, 31 and November 1*. Item LS16.1.

Toronto, City of. 2010. *Licensing and Standards Committee consideration on January 14*. Item LS26.8.

Toronto, City of. 2005a. *Minutes of the Special Meetings of the Council of the City of Toronto*, February 21– March 1.

Toronto, City of. 2005b. *Minutes of the Council of the City of Toronto*, July 19–26.

Toronto, City of. 2004. *Minutes of the Council of the City of Toronto*, June 22–24.

Newspaper articles

Alcoba, N. 2012. "Pole dance used to pitch city tweaking strip club rules." *National Post*, March 30, A13.

Anonymous. 2009a. "Politicians chase naked truth." *Toronto Star*, March 27, A1.

Anonymous. 2009b. "They saw no evil." *Toronto Star*, March 30, A12.

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press

Bell, S., and M. Jimenez. 2000. "Lax immigration rules encourage sex slave trade." *National Post*, April 15, national edition, A1, A4.

Campbell, D. 2000. "40 people charged following police sting." *Ottawa Citizen*, March 17, early edition, B17.

Corbett, R. 2004. "The naked truth behind Ottawa's stripper licence remains elusive." *Ottawa Citizen*, June 5, final edition, E3.

Danese, R. 2004. "Better safety laws needed for strippers." *Ottawa Citizen*, October 1, final edition, A5.

DiManno, R. 2012. "Shaking hands? That's touchy." *Toronto Star*, October 17, A2.

Doolittle, R. 2012. "Just relax the rules, strippers group says." *Toronto Star*, October 16, GT3.

Ferenc, L. 2000. "Neighbours fight strip club bylaw." *Toronto Star*, August 18, Ontario edition, B1.

Gray, K. 2000. "Cain would put lid on strip clubs." *Ottawa Citizen*, October 21, final edition, C3.

Greenaway, N. 2005. "Strippers' work conditions 'barely tolerable.'" *Ottawa Citizen*, February 6, early edition, A4.

Greenberg, L. 2005. "Minister rejects call to boost inspections at strip clubs." *Ottawa Citizen*, February 12, final edition, A5.

Gray, K. 2004 "City sheds plan to license exotic dancers." *Ottawa Citizen*, June 11, final edition, E1.

Hanes, A. 2009. "Baring all about strip club visit." *National Post*, March 28, A17.

Jaimet, K. 2000a. "Dancing with wolves." *Ottawa Citizen*, January 28, final edition, C9.

Jaimet, K. 2000b. "It's war on lap dancing." *Ottawa Citizen*, January 28, final edition, A1.

Jimenez, M., and S. Bell. 2000. "Strip club group vows to legitimize adult entertainment business." *National Post*, May 24, A11.

Jimenez, M., and C. Campbell. 2004. "Volpe ends exotic-dancer program." *Globe and Mail*, December 2, A4.

Kalinowski, T. 2007. "Strippers fight border legislation." *Toronto Star*, August 16, A12.

Kenney, J., and D. Finley. 2012. "Uniquely vulnerable." *Globe and Mail*, July 9, A10.

Kolbuszewski, M. 2004. "Cash grab from strip clubs." *Ottawa Citizen*, June 15, final edition, F4.

"Less than meets the eye." 2008. *Globe and Mail*, April 25, A18.

McGinn, D. 2007. "Are strip clubs losing their sex appeal?" *Globe and Mail*, December 1, M3.

Popplewell, B. 2008 "Bye lap dance, hello laptop." *Toronto Star*, April 28, A3.

Rider, D. 2012. "A city hall pole not poll. gets noticed." *Toronto Star*, March 30, GT1.

Stonehouse, D. 2000. "Strip clubs reveal intent to fight anti-lap dance bylaw." *Ottawa Citizen*, January 29, final edition, C4.

Swainson, G. 2000. "Residents attack strip club bylaw." *Toronto Star*, August 24, Ontario edition, B1.

Taylor, L. 2008a. "Strip clubs 'get creative.'" *Toronto Star*, June 10, A15.

Taylor, L. 2008b. "Stripper ban called 'unconstitutional.'" *Toronto Star*, September 5, A14.

Tralee, P. 2004. "Naked ambition." *Globe and Mail*, September 11, M1.

Wattie, C. 2007. "Dancers tear a strip off Ottawa over bill." *National Post*, August 16, A13.

Whittington, L. 2010. "Exotic dancing jobs not on table." *Toronto Star*, October 15, A15.

Tuulia Law
Department of Criminology
University of Ottawa

https://doi.org/10.1017/cls.2014.25 Published online by Cambridge University Press