



24 Tourists lining up for entry into an erotic theater in the Amsterdam red-light district (photo by author).

crowd (including many heterosexual couples as well as groups of single women) made it clear that this form of sexual spectacle was thoroughly mainstream—if not quite “family friendly”—entertainment.³

FIELD NOTES, JUNE 1999

Thus far, my predominant focus has been on the city of San Francisco, where the de facto decriminalization of indoor sex work and the introduction of “John School” in the 1990s helped (in coordination with broad sweeping economic transformations) to reshape both the external contours and the subjective meanings of commercial sexual transactions for sex workers and clients alike. We have seen that while street-based sex workers and their clients were driven off the streets of the Tenderloin and Mission districts, new kinds of commodified intimate relations were being fostered behind closed doors. On the one hand, the privatization of commercial sex represented an exacerbation of modern-industrial trends, as commercial venues that had previously featured striptease and exotic dancing were converted into brothels offering the efficient provision of hand jobs, blow jobs, and sexual intercourse. At the same time, the privatization of sex commerce offered unprecedented opportunities for cultural normalization and for

the market-mediated exchange of bounded authenticity, particularly for the city’s digitally inclined new middle classes.

In this chapter, I turn my attention to Stockholm and Amsterdam, two cities comparable in size and economic structure to San Francisco, where I conducted fieldwork during the summers of 1995, 1999, 2002, and 2003.⁴ As I noted in chapter 1, Sweden and the Netherlands represent two apparently antagonistic approaches to the state regulation of commercial sex and have served as exemplars for opposing factions of feminist theorists, social activists, and policy makers around the globe. As Barbara Hobson wrote, after researching and reviewing Swedish prostitution policy in the 1980s, “differences in approach go to the heart not only of a society’s organization of class and gender but also of the state’s role in regulating morals and markets. The study of prostitution becomes a two-way ideological mirror.”⁵ Sweden has often been upheld by feminist and other social researchers as both the exemplar of the interventionist welfare state and as “the nation in which equality has proceeded further than in any other Western country.”⁶ Since the 1970s, many commentators have assumed that brute manifestations of sexual, gender, and class inequality such as prostitution would wither away under a Swedish-style policy regime, featuring a well-tempered market and an interventionist social welfare state.⁷ In similar fashion, social libertarian strands of feminism and cultural analysis have often looked to the Netherlands for a vision of the ways in which states might endorse both sexual freedom and social welfare. For this second group of commentators, the Netherlands has stood for the utopian melding of a strong welfare state, *laissez-faire* moral philosophy, and harm-reduction policy agendas around “victimless crimes” involving consenting adults, such as prostitution and drugs.⁸

Some of the distinctions that social critics have sought to emphasize in the course of transnational comparisons were apparently well evidenced in 1998, when Sweden became the first country in the world to officially encode prostitution as a form of gendered violence against women by criminalizing the purchase of sex (but not its sale) in commercial sexual transactions. A mere two years later, the Netherlands took several bold steps in the opposite direction when it became one of the first Western nations to acknowledge the burgeoning sex industry as a legitimate commercial sector like any other, removing adult, consensual prostitution activity from the criminal code and instead applying occupational health, hygiene, and safety guidelines.⁹

Although feminists, sex-worker advocates, and others have often taken “criminalization,” “decriminalization,” and “legalization” to

represent radically divergent approaches to the regulation of commercial sex, this chapter highlights the ways that policy approaches which appear distinct on the surface can actually serve to facilitate similar shifts on the ground. In San Francisco, Stockholm, and Amsterdam, three quite disparate versions of policy reform in the late 1990s resulted in a common series of alterations to the social geography of sexual commerce: the removal of economically disenfranchised and racially marginalized streetwalkers and their customers from gentrifying city centers; the de facto tolerance of a small tier of predominantly white and relatively privileged indoor clients and workers; and the driving of illegal migrant sex workers further underground. While the broad constellation of attitudes toward gender and sexuality as well as other components of national and local cultures, histories, and regulatory strategies are by no means irrelevant to the configuration of sexual commerce in these cities, the shared realities ushered in by larger patterns of political economy have been more definitive in shaping its predominant forms.

In the pages that follow, I examine the genesis and consequences of the criminalization of prostitution in Sweden and the legalization of prostitution in the Netherlands, noting the salience of gentrification, globalization, and the exclusion of illegal migrants in both instances. After briefly summarizing the array of strategies that the two nations have historically employed to regulate sexual commerce, I draw on my own ethnographic research and analysis of government-sponsored reports to discuss the lived impact of the two divergent regulatory strategies. In the final section of this chapter, I return to the question that has undergirded much of the scholarly and political interest in transnational comparisons of U.S. and northern European approaches to the regulation of prostitution: whether and how contemporary state policies might be crafted toward better ends.

OVERVIEW: HISTORY AND POLICY

Activists and scholars have noted that there are three basic strategies that states have employed in the regulation of prostitution.¹⁰ These strategies range from formal government recognition of prostitution as a legitimate sphere of market activity (legalization), to tacit condonement (decriminalization), to official prohibition of prostitution for both buyer and seller as well as prohibition of all prostitution-related activities (criminalization). A fourth strategy might be said to combine elements from the above three approaches. In the contemporary West,

the regulatory systems of Nevada, the Netherlands, and Germany are frequently cited as exemplars of the first approach, while the remaining forty-nine U.S. states have typified the third strategy since the closing of the red-light districts during the Progressive Era.¹¹ As we have seen, in the late 1990s the city of San Francisco shifted from a criminalized to a de facto decriminalized system within the off-street market, while applying a more intensively policed form of criminalization to outdoor, street-level transactions.

In the 1970s, both the Netherlands and Sweden shifted from a strategy of prohibition by way of public decency laws passed at the turn of the century (laws which themselves succeeded a system of regulated brothel prostitution) to a “combined strategy” involving decriminalization of the prostitute-client transaction along with harsh penalties for prostitution-related activities such as pimping and pandering.¹² The previous public decency laws, like most prohibitive policies, were designed to remove prostitutes (but not their patrons) from public streets. At the same time, both states sought to supplement their legal approaches with an array of government-funded social service programs—programs that were targeted, almost exclusively, toward female prostitutes.¹³

Through the 1980s and 1990s, the contours of the legal frameworks in the two countries and the foci of their social services began to noticeably diverge in consequential ways. As with the 1996 attempt to decriminalize prostitution in San Francisco, and the subsequent implementation of “John Schools” in diverse cities, European municipalities, nation-states, and transnational bodies such as the European Union have found themselves scrambling to revise their prostitution policies.¹⁴ Swedish and Dutch officials who are charged with regulating prostitution agree that the reasons for the states’ revived interest in the regulation of sexual commerce are fairly straightforward: sexual commerce, regarded by some feminists as an archaic manifestation of traditional sex and gender arrangements, has not “withered away,” even in what remain relatively strong welfare states such as Sweden and the Netherlands. Rather, it has taken on a wide array of new and diversified forms, which are remarkably consistent across national contexts: massage parlors, escort services, sex tourism, and cell phone and computer network contacts.¹⁵ In addition to the extension of sexual commerce into new cultural terrains, concerns have also been stimulated by the expansion—or feared expansion—of migrant prostitution and human trafficking. The fear of trafficking has increasingly

guided European prostitution policy since the early 1990s (nearly a decade before it became a pivotal domestic and foreign policy issue for the United States).¹⁶ Significantly, neither Swedish nor Dutch feminist efforts to reform prostitution policy in the 1990s met with much success prior to the emergence of the trafficking debates. In both cases, feminist rearticulations of prostitution policy in accordance with the new framework of “trafficking” proved highly successful in gathering momentum, even if the legislation that eventually passed had some surprising consequences once put into practice. As I shall describe in the following sections, whereas in Sweden the criminalization of demand has been used to justify both the maintenance of public order and the protection of trafficked women, in the Netherlands the specter of sex trafficking has led to an explicit differentiation in social policy between “forced” and “voluntary” prostitution.¹⁷

THE FEMINIST STATE AND THE GLOBAL SEXUAL MARKETPLACE: CRIMINALIZING DEMAND

Sexuality is not something that can be bought or sold. Women are selling a totally empty body; men think they are buying something more Being a customer is like being a prostitute in that you must switch your mind off. It's like Dr. Jekyll and Mr. Hyde. That's why not all men can buy. A real, whole man who is socially functioning . . . will not be able to.

ELISABETH PETERSSON, director of the Göteborg Prostitution Project and member of the 1993 Swedish Prostitution Commission¹⁸

The system's commodity and market-like character . . . set limitations. It involves a bond with more or less well-masked coldness and in a certain way, a double exploitation

SVEN AXEL MÅNSSON, Professor of Social Welfare at the University of Göteborg and member of the 1993 Swedish Prostitution Commission¹⁹

In 1998, Sweden became the first country in the world to unilaterally criminalize the purchase of sex for male customers. Although clients are increasingly arrested in U.S., British, Canadian, and French cities, Sweden is the first and only country to penalize the customer—but not the prostitute—in written law. The new law was not part of the penal code but rather part of a package of laws called the Violence against Women Act, which also widened the definition of rape to include other acts in addition to sexual intercourse, increased social services for victims of domestic abuse, and stiffened penalties against genital cutting and sexual harassment.²⁰ Although framed in gender-neutral terms, the

law understands prostitution to be a manifestation of gendered power relations, with female prostitutes serving male clients' sexual needs.²¹ It thereby declares prostitution to be incompatible with the Swedish goal of gender equality.

As we have seen in our discussion of San Francisco's “John School,” second-wave feminists have frequently bemoaned the sexual double standard in the treatment of prostitution by the criminal justice system (in which female sex workers are arrested, while the sexual behavior of their male clients is tacitly allowed). Apparently in response to concerns such as these, the Swedish Parliament reversed a historical trend in voting to criminalize the (presumptively male) buyer of sexual services, while leaving the (presumptively female) seller's decriminalized status intact. The text of the government bill stated plainly the Swedish Parliament's position, declaring “it is not reasonable to punish the person who sells a sexual service. In the majority of cases at least, this person is a weaker partner who is exploited by those who want only to satisfy their drives.”²² In 2002, a few years after the law's passage, the government instituted a vibrant public relations campaign that offered dramatic visual imagery promoting this view, blanketing 2,215 different public locations with color posters that informed potential customers and other citizens of sexual clients' newly criminalized (and pathologized) status.²³ One poster featuring a cluster of ordinary-looking middle-class men ominously announced that “one man in eight has bought sex.” Another depicting a faceless male figure in a suit and tie declared it “time to flush the johns out of the Baltic.” A third poster highlighted the gendered dimensions of the new cultural fears which were circulating around the emergence of the Internet and other new technologies: “More and more Swedish men do their shopping over the Internet It's a Crime to Buy Sex.”

Though the posters and the official discourse which surrounded the law's passage both suggest that its primary objective was the extension of Sweden's celebrated “gender equality” policy to sexual as well as economic and political terrains, a closer examination of the diverse interests behind the passage of the new law reveals that gender rectitude was not the only guiding concern.²⁴ In origin as well as in consequence, Sweden's landmark legislation—pushed through Parliament with great fanfare by feminist Social Democratic politicians—has had as much to do with the symbolic politics surrounding questions of Swedish national identity as with questions of sex or gender per se. In fact, the Swedish Prostitution Committee's decision to implement the new law criminalizing clients emerged in tandem with heated



25 Swedish publicity posters following the passage of 1998 law criminalizing the purchase of sex (English language version for international distribution). Näringsdepartementet, Regeringskansliet <http://www.regeringen.se/content/1/c6/02/36/39/531010d0.pdf>.

social debates about whether or not Sweden should join the European Union. As the anthropologist Don Kulick has observed, “In the early 1990s . . . talk about prostitution had a subtext—in addition to being about the referent ‘prostitution,’ it was also about the EU and Sweden’s relationship to it.”²⁵ In addition to confronting the blurred boundaries between public and private and licit and illicit sex that the emergence of the Internet seemed to represent, Sweden was confronting the immediate and literal blurring of national boundaries through the specters of Europeanization and globalization. The 1998 law criminalizing the purchase of sex aimed to stabilize cultural and geopolitical boundaries simultaneously.

Though the law officially prohibits the client’s behavior (a client who is uniformly depicted as white, middle-class, and computer-literate in the public relations posters), in many ways it is still the sex worker whose presence in Sweden is at issue—particularly the migrant sex worker. The national prostitution commission which ultimately recommended the new law was first established in 1993 to address a wide variety of concerns stemming from the “internationalization” of the new global order. Government officials were concerned both with an anticipated flood of migrants from the east in the wake of the recent Soviet collapse, as well as Sweden’s impending and controversial entry into the European Union.²⁶ From its inception, one of the explicit

goals of the commission was to seek a means to combat what they saw as the “free market” in sexual commerce advocated by the European “pro-prostitution lobby” and endorsed by the European Community Court. As Sven Axel Månsson, an outspoken member of the Swedish Prostitution Commission, cautioned: “A European Community member state cannot deny a foreign prostitute (from another member state) the right to work within its premises as long as prostitution is not illegal or subject to other repressive measures in that particular state. As most member states have decriminalized prostitution, [this] . . . opens the way for a free movement of ‘sex workers’ within Europe.”²⁷ In language which highlighted the fear of an incursion of foreign sex workers, the Swedish Prostitution Commission declared arguments for the decriminalization of the European sex trade to be “alien to Swedish principles.”²⁸

Although the new Swedish policy marks an important shift from a social-service to a criminal justice system approach (the equivalent of 1.5 million U.S. dollars were given to the police, while no additional monies were given to social service agencies to enforce the new law), it has been taken by many Western feminists to represent an instance of aggressive state intervention against the incursion of global forces of inequality.²⁹ Government spokespersons routinely boast that the law has been an effective means of eliminating not only street prostitution but also trafficking in women.³⁰ Yet my own interviews with Swedish sex workers, law enforcement officials, government representatives, and activists uniformly suggest, first, that the presence of street-based and migrant sex workers in Sweden prior to the legislation was minuscule to begin with, and, second, that, if anything, the new legislation has actually served to augment, rather than delimit, the Swedish market in commercial sexual services.³¹

During our interviews, Swedish police officials routinely complained about the difficulties they faced in attempting to arrest clients, given that entrapment of any sort is illegal.³² This is one reason, they say, that they have chosen to focus their attention on eliminating the most visible contours of commercial sex work from city streets. A second reason for the police’s continued focus on street-level transactions likely has to do with what Swedish criminologists Toby Pettersson and Eva Tibby have referred to as the “problem of definition,” whereby those individuals who do not conform to the stereotype of the street-based, strung-out “drug whore” (e.g., women who arrange commercial sexual contacts with their clients through Internet Web pages; male prostitutes who make contact with their clients in bars or chat rooms) may

be difficult to recognize as prostitutes at all. Can “prostitution” be said to exist where there are no prostitutes? As one of Pettersson and Tibby’s interviewees from the social service sector explained:

Before [the new forms of contact came along] it was easy, black or white. Now it’s become more confused somehow . . . the women who’ve been involved [before], it’s been so obvious that they were prostitutes. [“]I’m a prostitute, kind of thing, I walk the streets.[”] There’s no mistaking it. But the closer you come to the other end, the more complicated it must become for the women too. It might be very good-natured and cosy, this man maybe buys dinner and yeah, then some regard it as a date. And then you get paid for it—it’s a bit weird.³³

Based on their interviews with Swedish police officials and social service workers, Pettersson and Tibby conclude that although the Swedish law explicitly sought to shift the stigma away from female prostitutes and toward male clients, “the traditional position of the bad woman as vendor and the invisible man as purchaser is preserved . . . [while] all other constellations, that may as well be considered to be prostitution, remain unproblematicized.”³⁴

As my own police ride-alongs and various government reports reveal, urban streetwalking strolls constitute the sole focus of police attention, despite the fact that street prostitution represented a dwindling minority of the Swedish sex industry to begin with, and one in which proportionately few migrant prostitutes are employed.³⁵ Among the police officers, social workers, and street-based sex workers that I interviewed, there was broad consensus that the overwhelming majority of street prostitutes were Swedish citizens. While police officers admit that patrolling the streets has not accomplished much in terms of stemming the high-growth sectors of the industry—tourist-oriented strip clubs, massage parlors, and the new online services—as the following field note extract reveals, they often regard it as the most tangible way to make a difference.

Last night I spent several hours on prostitution patrol duty with Johannes, a member of the Stockholm police squad, observing the sparse handful of female prostitutes who were still on the streets of the central business district. Johannes was intimately acquainted with each woman’s face, name, and personal history (“That one, she only comes out here when she’s short of money, when she’s going on vacation, or when she needs money to pay the rent”). Having left the neighborhood and on our way back to my flat in

the Södermalm district, Johannes gestured to what he identified as one of fourteen illegal massage parlors in the city where sexual services were readily available for purchase. As we drove past, he chuckled quietly at the hypocrisy of Swedish prostitution policy: “These it is ‘too difficult’ to do anything about. It takes too much time, and it requires too much evidence.” Johannes’s comments echoed the observations of Sonja, an exotic dancer at the “company club” that I visited yesterday.³⁶ To my astonishment, she remarked casually that “the police don’t care what goes on at the clubs. They’re on our side [against the new law] and will wink when they ask us, ‘You have a g-string on, right?’”

FIELD NOTES, JULY 2002

The Swedish sex workers that I spoke with insisted that since the law’s passage, prostitution has not disappeared but rather moved underground. In cities such as Stockholm and Göteborg, with high-priced, glutted housing markets and thriving tourist industries, such enforcement strategies have conveniently served to displace streetwalkers from the very downtown areas that government and real estate officials are interested in developing.³⁷ As a consequence, the majority of streetwalkers have switched to different forms of client networking, resorting primarily to cell phones or the Internet. As in other Western European and U.S. cities, the vast majority of prostitution activity had in any event already moved indoors, free from the supervision of social workers and the scrutiny of the police.³⁸ In this sense, the law has hastened a shift in the social geography of commercial sex work—one common not only to Stockholm, but also to other postindustrial cities—that was already underway.

At 8 p.m. Sven Pettersson arrives, the police officer who has been assigned to show me around the city of Göteborg’s prostitution strolls. He is a small, friendly man, dressed in a tan jacket and jeans. Although his unmarked navy blue vehicle is parked in front of my hotel, we decide to go exploring on foot.

Our first destination is the city’s former red-light district, which, at least at this hour, seems to consist of nothing more than an isolated, empty street and its adjacent parking lot. It is utterly unpopulated, save for a pair of rumpled women in their mid-thirties with skinny, bruised arms and bloodshot eyes. They turn to glance at us briefly before stumbling away. About fifteen minutes later, a lone, matronly Polish woman appears. Sven knows her and explains that she is now married, no longer working, and legally residing in Sweden. Like many of the police officers I have met in Sweden, Sven stresses his comfortable, quasi-familial relationship with the women,

at one point even pulling out the red rose-embossed business card of a friend who has recently left the streets.

We head over to the city's main cruising area, hoping to see a few of the city's male prostitutes, but this area, too, is completely empty. We do the next segment of the tour in his car, driving over to Göteborg's three other prostitution strolls, which are pristine, orderly, and again, devoid of any discernible prostitution activity. Sven indicates the few venues in the area with checkered pastis—the mall, the video store, the parking lot where prostitutes would take their Johns. At the train station (the chief locus of street prostitution in many European cities) there has not been any activity for some time. Compared to 1995 (when a female research colleague and I walked through Göteborg's red-light district and were trailed by at least twenty or thirty cars, driven by men anxiously looking for dates), the city's street prostitution scene seems to have been radically transformed.

Before we part, I ask Sven what he thinks of Sweden's new law criminalizing the clients of prostitutes, and the 10 million crowns that was given to the police department to enforce it. I am somewhat taken aback when he issues an embarrassed laugh: "Do you want the official or the unofficial answer?" (Of course) request the latter. "The truth is that I am the whole prostitution patrol force!"

FIELD NOTES, JUNE 1999

THE CONSEQUENCES OF CRIMINALIZATION:

TANYA'S STORY

Prior to the new law, selling sex without an intermediary was not a crime, although "living off the earnings of a prostitute" was.³⁹ With the shift from the streets to the Internet, many formerly independent sex workers who were engaged in legal activity have been impelled to rely on criminal intermediaries in order to contact clients. Several women that I spoke with noted the emergence and prevalence of "Internet pimps" over the last several years, whose job it is to help women run their businesses covertly. And, at least according to some, this growth in the illegal sector of the industry has actually paved the way for the arrival of more migrant prostitutes, as well as more traffickers.

Tanya was one individual I encountered who articulated the linkages between the new Swedish prostitution law and the broader transformations occurring in the Swedish sex industry clearly and unambiguously. A former street prostitute, Tanya was currently working as a "trafficker" (her term), facilitating the passage of Estonian women into Sweden to sell sex. Although it is impossible to say that Tanya's story is in any sense typical, her professional transition encapsulated some of

the broader changes in the Swedish sex market that were identified by a number of the sex workers I spoke with.

During our interview, Tanya described the way in which street clients' newly born fear of arrest eventually led her to place an ad on the Internet. Because of her transsexual background, this was a potentially dangerous arrangement for her—unlike face-to-face contacts on the street, the clients that she met online did not necessarily know what they were "getting." Often clients would show up and be disappointed that she didn't have a conventionally legible female body: "They wanted the service," she explained, "just not from me." So Tanya decided to use her Internet skills and the client contacts that she had established to help other women make the shift indoors. While her initial employees were all Scandinavian women that she knew from the streets, she eventually came to employ less expensive Estonian women instead.

In her current business, she offers what she calls "a complete service" to the women, providing everything except for visas. Once they arrive at their contact point in Sweden, Tanya secures their apartments, arranges for clients, and takes care of security. She employs only one or two women at a time and arranges for them to stay in Sweden from anywhere between one week and three months. Although she is glad that she can pay the Estonian women approximately a third less than the Swedish ones for the same work, and acknowledges that she retains custody of the women's passports while they are in her employment, she insists that the arrangement she has with them is not exploitative:⁴⁰

Many of the girls are still in school, so they come [to Sweden] for only a short holiday. The average number of clients per day is three or four. I know one girl who earned 120,000 kronor [~16,000 U.S. dollars] after seven weeks. She had that much money in her pocket when she went home!

The girls work in private apartments, normal houses. Some I can trust and some I can't. Once, a girl disappeared with my phone and my key, and then called to tell me that I would need to buy them back from her! So now I'm more careful. . . . There has been plenty of talk about "slave trading" in the business. In my case, not only do the girls want to come here to work, but they actually pay their Estonian contact person to get in touch with me. Most of them have done this work before. . . . It's in everybody's interest that the girls be happy and do good work.

It's a big market, and there are many countries who are asking for them. Sometimes, I can't even get enough girls, so I need to maintain my reputation as a good employer. Business only goes well when everyone is happy.

Some would argue (along with Tanya herself) that the new Swedish law has backfired in failing to curb either the demand for commercial sex or the incursion of migrant sex workers, thereby enabling businesses like Tanya's to thrive. Together with Kulick (2003), I would argue instead that it has served to assuage anxieties about national identity through a series of symbolic substitutions. Anxieties about slippery national borders are deflected onto anxieties about slippery moral borders, which affix themselves onto the bodies of female street prostitutes. The removal of these women from public streets can thereby pave the way for real estate developers, while bolstering Swedish national identity in the process.

THE AMBIVALENT EFFECTS OF LEGALIZATION IN AMSTERDAM

Amsterdam's *tippelzone* is the architecturally elaborated street prostitution area that the Dutch government has provided for sex workers and their clients since 1997. The zone was created in order to transform furtive and dangerous sex-for-money or sex-for-drugs exchanges (which typically took place in the city's downtown area, behind the train station) into the safe, rational, and state-managed provision of sexual services. Given the *tippelzone's* location in an industrial district some distance from the center of town, it is difficult to resist thinking of it as just another exceptionally well-maintained factory. The drop-in center is staffed by a full professional team of doctors, social workers, and Russian and Spanish language translators. The facilities and gates to the center are freshly painted in brightly colored hues. A neatly manicured lawn surrounds a smoothly paved ring road with protective shelters and comfortable benches for sex workers to rest their high-heeled, weary feet. There are phone booths in perfect working order at each ten-foot interval, and cleverly partitioned stalls so that clients and workers may park with privacy (complete with waste baskets for the disposal of condoms).

Each *tippelzone* boasts a *huiskamer*, or drop-in center for the workers. *Huiskamer* means "living room," which seems to bespeak the government's attempt to normalize and domesticate commercial sexual exchange. Open nightly from 9:00 p.m. to 5:00 a.m., the *huiskamer* provides all variety of medical and social services to street workers, including free coffee and tea,

affordably priced condoms and sandwiches, and a "tippelteam" for regular police protection. The *huiskamer* is decorated with crepe-paper ornaments and boasts a big screen TV, an array of board games and posters, and large bowls of fresh fruit. On the bulletin board, there is a list of "dirty tricks" in three languages: Dutch, Russian, and Spanish, and an announcement posted for a workshop on immigration law. A video monitor patrols the entrance-way to the facility. The resident social workers advise the girls about everything—even prices. "We tell the girls not to go outside the zone. It's safe here. And we suggest that they not work under fifty guilders [~ 25 U.S. dollars]," explains Miryam, the young college student who has been employed part-time at the center for the last two years. "It's bad for self-esteem."

According to Miryam, some seven hundred cars drive through the area each night. In contrast to the city's official red-light district, geared primarily toward tourists, this is where the resident population (Dutch and foreign-born) comes to buy sex. Says Miryam, "A quiet night is when the cars, which range from pickup trucks to Porsches, are only twenty deep." From sixty to ninety different sex workers pass through the *huiskamer* each evening, and approximately one thousand different women use the center each month.

Half of the workers are *travestis* from Ecuador and Colombia, who have been migrating to Amsterdam since 1996;⁴¹ the other half are Eastern European. At most four or five of the fifty or so sex workers present tonight are Dutch. "The Eastern European group is generally quiet and reserved, as they tend to work with pimps," explains Miryam. "The Polish and Rumanian groups are getting bigger and bigger; we have had increasing problems with criminality." Hardly any of the prostitutes who work here are addicted, because the area is difficult for drug-dependent women to reach on foot (and far away from their supply of drugs). In theory, none of the women are underage. The social workers admit that most of the women who work here do not have a visa. Some women work every night for two years; others leave after two weeks for Rotterdam or other European cities.

The atmosphere here is a surreal blend of legality and illegality, of work and festa. While I was talking with Miryam this evening, a tall, stunningly beautiful, Spanish-speaking *travesti* named Lola appeared before us to complain about a client from the prior evening—"Que me esta haciendo la vida imposible." She gave us the license plate number, to be promptly filed with the police. While forty or fifty other sex workers outside were selling safe and sanitary hand jobs and blow jobs, and the number of cars circling continued to multiply, Lola went in to join a group of another ten *travestis* who were clustered around the "living room" table, smoking, laughing, and sharing food while Latin rhythms played.



26 Prostitution stroll and car park for customers in the Amsterdam *tippelzone* (photo: Jacqueline).

In the Netherlands, the legal reasoning in dealing with prostitution proceeded—at least on the surface—somewhat differently from the sequence in Sweden. On October 1, 2000, nearly two years after the passage of Sweden's Violence against Women Act, the Dutch Parliament revised the nation's legal code to legalize indoor prostitution and brothel keeping, officially transforming a black market economy into a business sector to be regulated like any other, subject to the usual labor codes and guidelines—including taxes and hygiene and safety regulations.⁴²

To a diverse array of commentators, the new law became an instant symbol of political pragmatism and social tolerance. Within the Netherlands, the legislation passed with relatively little fanfare or controversy—most of the major interest groups were in agreement that prostitution had become a “fact of life” and should be dealt with accordingly.⁴³ As Jan Visser, then director of the Mr. A. de Graaf Stichting (the government-sponsored foundation specializing in prostitution-related issues) explained, “The management and control of dense city life have become too complex to allow a subculture to stay outside of the system.”⁴⁴

Yet there was one key provision of the new law legalizing the Dutch sex trade which received far less attention from the international press: the law stipulated that only adult, legal residents could be employed in indoor venues such as brothels, massage parlors, and sex clubs, and it mandated prison sentences of up to six years for individuals found guilty of forcing others to engage in prostitution, employing the services of a minor, or bringing others across national borders to engage in prostitution.⁴⁵ Brothels discovered to be employing or renting space to sex workers who were not legal residents of the European Union and/or lacking the proper documents would be shut down (and to facilitate enforcement of this provision, all prostitutes would now be required to carry proper identification papers with them). In a country where 50 to 60 percent of the sex trade was comprised of migrant women who had been working without official documents, this stipulation was, not surprisingly, enormous in its consequences. As one former member of the Dutch sex workers' rights organization, the Red Thread, observed during our interview, “At least 12,000 women were made illegal overnight.”⁴⁶

Immediately following the law's passage, nearly a quarter of the brothel windows in the red-light district were empty; many have been conspicuously papered with “for rent” signs ever since. While a sizable portion of illegal sex workers left the country for neighboring Germany or Belgium, those who remained were often relocated to the



27 Brothel windows for rent in the Amsterdam red-light district (photo by author).

tippelzones or resorted to working in underground escort agencies and through the Internet. As the *tippelzones* were initially constructed as a means to displace local drug-injecting streetwalkers, by the beginning of this decade the use of such zones by illegal migrants had begun to inspire sharp critiques. City officials complained that women who were engaged in sex-for-drugs preferred to remain in the downtown areas where they could be in greater proximity to their drugs. As the population of sex workers in the *tippelzones* expanded and anti-immigrant sentiment gathered steam, the city's leaders were accused of running open-air brothels for illegal migrants, and pressure mounted on municipal governments to close the zones. In response to public outcry, the Amsterdam *tippelzone* (the city's last "zone of tolerance" for illegal

migrant prostitutes) was shut down by municipal politicians in December 2003; the *tippelzones* in Rotterdam and The Hague have also since been eliminated.⁴⁷

Meanwhile, reeling from the combined effects of a labor shortage and the additional costs entailed by complying with occupational health and safety codes, the majority of smaller sex businesses were forced to close up shop because they could not afford to pay taxes or to abide by the new labor guidelines. Women like Marie, an escort and former madam in her late thirties with a practical demeanor and a compelling, straightforward manner, recounted to me the daunting professional hurdles she faced on implementation of the new law. Over tea and biscuits in her sparsely decorated three-bedroom flat in the outskirts of Amsterdam, she noted that although she had previously rented out two of the bedrooms to other escorts, her options were currently limited to working alone:

From the state's perspective, two women working together constitute a brothel that must be subject to controls. One day when I was working here the police came in, and one of the women who was working with me didn't have her identification papers with her. Although the woman was actually Dutch, with a thick Rotterdam accent, they threatened to take her to the police station to find out who she was. They came back two weeks later, and did the same thing with another girl who was actually from Brazil, who worked two days each week to send money back home, but whose husband didn't know that she was working. She freaked out, and said that she wouldn't work with me anymore. Eventually, it became hard to stay in business because under these circumstances, I could not get girls.

The last straw was when I wanted to move upstairs to a bigger flat so that I could have more space. When I applied for the permit to run my business there, they asked if it was more than seven meters. I said that it was seven-ten. They told me, in that case, that I would need fire stairs, which would cost me 20,000 guilders [~ 10,000 U.S. dollars].

At this point, I am in a totally different profession—I work twenty hours a week in a restaurant. So now, I don't need to pay for insurance or permits, and lower income at least means lower taxes. Occasionally I still see my regular clients, here, by myself, alone. I have the right to advertise, but I cannot work here

with a friend (which would be safer and more fun for me) because then I would be considered a “business” and I would need fire stairs.

According to accounts by sex industry workers, local activists, and the Dutch government, the size of the Dutch sex industry shrank by at least 35 percent, leaving only the largest corporate enterprises behind. Several of the self-employed sex workers that I spoke with during the summers of 2002 and 2003 said that working conditions had become so difficult, and the prices for sex work had fallen so low, that they had even contemplated migrating to the United States to work—where sex work is criminalized, and thus unregulated and higher paid. Only the largest and most established sex clubs and escort agencies could boast that, in the wake of the new law, they continued to glean high profits.⁴⁸ A centralization of power has thus been achieved, pushing down prices for sex and narrowing the range of potential employers. In this way as well, the most profound effect of legalization has been a reconfiguration of the scope and character of the Dutch sex industry, away from the informally organized prostitution of the desperate (illegal migrants, underage prostitutes, and substance-dependent women) and toward the centrally managed, rationalized sex work of white, native women and a handful of highly organized migrants.

In a discussion of prostitution regulatory strategy in the Netherlands, the legal scholar Chrisje Brants has described the subtle (and distinctively Dutch) mode of social control known as *gedogen*, or “regulated tolerance.” Brants emphasizes that the notion of tolerance that is implied by the word should by no means be taken to imply downright approval. Rather, “it involves self-regulation, enforced if necessary through administrative rules, but always with the criminal law as a threat in the background.”⁴⁹ Consistent with Brants’s analysis, some local activists maintain that underpinning the official Dutch policy legalizing prostitution is a more covert policy which rids the country of many of its migrant workers.⁵⁰ This policy followed on the heels of successive waves of legal restrictions to immigrants’ rights (restricting the right to rent an apartment, to purchase insurance, etc.).⁵¹ The “trafficking debate” has been a crucial force in reshaping Dutch prostitution policy in the service of a broader anti-immigrant agenda. As Marieke Van Doornink of the de Graaf Strichting has noted, “in the ‘forced vs. voluntary’ distinction that the Dutch law has been premised upon, it is only the Dutch sex workers who have been deemed capable of choice.” Jo Doezeema, a sex-workers’ rights activist who has worked in Amsterdam’s red-light district, has similarly observed,

TABLE 1 Numbers of prostitutes and migrant prostitutes in some Western European countries in the late 1990s

	Inhabitants	Prostitutes	Migrant Prostitutes
Sweden	8.5 million	2,500	600–700
Norway	4.5 million	3,000	500–600
Denmark	5 million	6,000	2,000
Finland	6 million	4,000	1,750
The Netherlands	15 million	30,000	15,000
Germany	80 million	300,000	150,000

Sources: Randers-Pehrson and Jessen (2000, 0); TAMPEP (2002, 242)

The “voluntary” prostitute is a Western sex worker, seen as capable of making independent decisions about whether or not to sell sexual services, while the sex worker from a developing country is deemed unable to make this same choice: she is passive, naive, and ready prey for traffickers. Potentially the most frightening division, however, created by the voluntary/forced dichotomy is that of sex workers into guilty/“voluntary” and innocent/“forced” prostitutes, which reinforces the belief that women who transgress sexual norms deserve to be punished. This division is thus a threat to the entire concept of women’s human rights.⁵²

Over the last few years, the population of migrant sex workers in the Netherlands has gradually begun to rise again. For many, the economic incentives to migrate are in and of themselves sufficient—whatever the legal consequences. But some sex-worker advocates now argue that those who might have been in a position to migrate and work autonomously in the Netherlands under the previous decriminalized system are now far more likely to become reliant on criminal networks for fake passports and identification papers. The process of securing false documents is not only costly and difficult for sex workers but constitutes a criminal offense. As Van Doornink has stated, “It is easy to imagine that someone who was not a victim before—who was just here working independently—could become one under the new law.”⁵³

CONCLUSION: PARALLEL TRENDS

In recent decades, states and municipalities throughout North America, Australia, and Western Europe have sought to contain a burgeoning and diversifying sex trade through a variety of innovative measures—from stepped up enforcement against the perpetrators of “quality of life”

crimes to the legalization of brothel keeping to increased client arrests. These efforts have arguably constituted a “third wave” of reform surrounding the state regulation of prostitution during the last century. If the first wave occurred with the closing of the red-light districts and the elimination of licensed brothel prostitution in the first decades of the twentieth century, and a second wave occurred with the liberalization of laws surrounding commercial sex in the 1970s, a new series of transformations has occurred in tandem with the postindustrial expansion and transnationalization of sexual commerce.

“Prosex” as well as “antiprostitution” feminists have produced diverse accounts of the gendered meanings that comprise the commercial sex-work transaction, arguing for an array of competing legal remedies—including decriminalization, legalization, and criminalization—and for the broader implementation of “Dutch” or “Swedish” policy models, as we have seen. Few commentators, however, have situated their analyses within the context of postindustrial transformations of sexuality and culture. My research demonstrates that the failure to situate sexual commerce within a broader political-economic framework can lead advocates to argue for opposing tactics which, once implemented, might have surprisingly similar effects on the ground. Whether sex work is decriminalized, legalized, or criminalized, the interests of real estate developers, municipal and national politicians, and business owners may overshadow the concerns of feminists and sex workers.

What is arguably most remarkable about the disparate array of legal strategies that Europeans and North Americans have implemented in recent years is how singular they have been in effect: The overarching trend has been toward the elimination of prostitution from city streets, coupled with the state-facilitated (or *de facto* tolerated) flourishing of the indoor and online sectors of the sex trade. Despite their seeming differences, the common focus of state interventions has been on eliminating the visible manifestations of poverty and deviance (both racial and national) from urban spaces, rather than the exchange of sex for money per se.

Different policy regimes and national cultures clearly can have an impact on the scope and character of the commercial sex trade. Sweden’s prohibitive attitude toward prostitution (both before and after the new law) has been manifest in a comparatively small commercial sex sector of about 2,500 prostitutes, compared with a figure of about 30,000 in the Netherlands—a country with only twice Sweden’s population.³⁴ Conversely, the Netherlands’ pragmatic recognition of the sex

trade as a legitimate sphere of commerce and employment has resulted in greater social legitimacy and working conditions for at least some parties, who have the opportunity to work free from police harassment, to openly declare their occupation on their bank accounts and tax forms, and to present themselves, in the words of Yvonne (one of the brothel owners that I interviewed) as “honest, hardworking businessmen” [*sic*].

Given these differences, the impulse among feminists and sex workers’ rights advocates to call on the example of either country in order to advance a particular normative agenda is understandable, but it is also fraught with difficulties. One of the key problems that can emerge is a simplification of political dynamics, including a failure to consider the multiple motives of political actors, notably those which surround questions of migration, national identity, and the gentrification of cities. In the wake of European unification and other global transformations, Sweden, the Netherlands, and other countries find themselves confronting similar material and symbolic dilemmas, ones which undergird and overshadow concerns about the regulation of commercial sex.

The global restructuring of capitalist production and investment that has taken place since the 1970s has meant that legal and illegal migrants in search of many different forms of work have continued to press against Western European and U.S. borders; meanwhile, for Swedish, Dutch, and other postindustrial city dwellers, deindustrialization, unemployment, and a lack of affordable housing have become the local face of the same global processes. For Swedish and Dutch citizens, the economic hardships entailed by unification have further contributed to a fragile and wavering sense of national identity. In the face of difficult-to-remedy structural transformations such as these, both Sweden and the Netherlands have created policies which reinforce a coherent sense of national identity by more closely regulating the prostitute body. In both cases, a semblance of cleanliness and order has been created by eliminating streetwalking and—in the case of the Netherlands—concentrating sex workers in corporate-run brothels.

Both countries, furthermore, make a show of policing illegal migrants, attempting to eliminate the most visible presence of migrant sex workers from public view. The national project is thereby reinforced and made to appear as “more moral” in each case—despite the fact that the policies of both countries have apparently served to strengthen the hands of the criminal networks that facilitate illegal migration. And, last, the policies of both Sweden and the Netherlands serve to bet-

ter align each country with the local forces of globalization, facilitating gentrification and tourism. Despite some important surface-level contrasts, the cases of Stockholm, Amsterdam, and San Francisco demonstrate that regimes which legalize the sex trade as well as those which claim to seek its elimination share several common threads which link them to larger changes within the global economy.

Taken together, the cases also speak to a broader set of theoretical and political concerns about the state's role in achieving social reform—concerns which have long plagued feminist scholars interested in questions of prostitution, pornography, and other issues. As with the development of San Francisco's "John School," both the legalization of prostitution in the Netherlands and the criminalization of clients in Sweden were sought after and fought for by avowedly feminist constituencies. Yet as my own discussion in this chapter and the abundant literature on women's engagement with the state both reveal, feminist movements have good reason to be wary of forging alliances with non-feminist state actors who claim to represent their best interests.⁵⁵ The question necessarily arises as to whether or not it is possible to forge a prostitution policy that simultaneously empowers sex workers and protects other women from the gendered sexualization of public space that certain feminists fear.⁵⁶ In this era of global flows of capital and culture, what are the potentials and limits of state policies that claim to speak on behalf of women? This is a critical question which my discussion in this chapter has anticipated, and which I shall address further in chapter 7, the conclusion to this book.

7

Sexuality Debates and Pleasure Wars

At a 1999 academic conference entitled "Economic Justice for Sex Workers," the panelists and audience members drew the battle lines quickly, coalescing along the expected lines of ethical and political division into two opposing camps.¹

While the conference organizers and other sex-worker advocates argued passionately not only for "economic justice" but also for the decriminalization and social legitimization of sex work, a coalition of former prostitutes and antitrafficking activists rallied against the violence and exploitation that they perceived to be inherent in the sex trade and for the need to abolish the sex industry. With the tension building, and for the need to abolish the sex industry. With the tension building, and Norma Jean Almodovar, cofounder of COYOTE, Los Angeles, and a former prostitute herself, stepped up to the podium to explain not only the potential economic benefits but also the erotic and emotional pleasures of prostitution. In response, a visibly agitated audience member jumped to her feet. "How could you enjoy sleeping with hundreds of men?" she demanded, "Sex is supposed to be intimate and private, with one person you love."

The rendition of the feminist sexuality debates that was enacted by the conference participants was both well rehearsed and illuminating, in that it brought to the fore the distinct normative visions of sexuality that have underpinned ideological conflict around commercialized sex over the last quarter-century.² During the same period that the feminist "sex wars" have continued to gather steam, within the broader political field contestations over issues such as gay marriage, abortion, and sex education have served as prominent signposts of widespread cultural conflict over shifting sexual relations and norms.³ In this chapter, my

- extended time,” “discounts for repeat customers,” and “discounts for senior citizens.”
34. Marx was the first to note the ironic leveling capacity of market transactions, though in lament rather than in celebration: “That which is for me through the medium of *money*—that for which I can pay (i.e., which money can buy) that am I, the possessor of the money. The extent of the power of money is my power. Money’s properties are my properties and essential powers—the properties and powers of its possessor. Thus what I *am* and *am capable* of is by no means determined by my individuality. I am ugly, but I can buy for myself the most *beautiful* of women” (Marx [1844] 1978: 103).
35. Frank (2002a: 205).
36. Pateman (1988: 199).
37. Giddens (1992: 77).
38. Irvine (1993), Keane (2002). See also Kaye (2002), who notes that “Beginning in the early 1980s . . . a proliferation of recovery groups rose to address almost every imaginable sort of compulsion: sex, love, gambling, overeating, “undereating” (i.e., anorexia), impotence, shoplifting, self-mutilation, overspending.” Kaye observes that “although the diversity is remarkable, it is not infinite. A behavior must simultaneously be subjectively desired and socially problematized in order to be seen as an ‘addiction’ (e.g., while there may be ‘women who love too much,’ thanks to the relational changes wrought by feminism, there are as yet no ‘women who love their children too much.’)”
39. In Foucault’s lexicon, “biopower” refers to Western power in its modern incarnation, “characterized by increasing organization of population and welfare for the sake of increased force and productivity” (see Dreyfus and Rabbinow 1982: 7–8).
40. See, e.g., Harvey (1990), Castells (1997), Illouz (1997), and Jakobsen (2002). The political theorist Wendy Brown has devised the term “reactionary fundamentalism” to refer to the postmodern longing for fixity and durable attachments (Brown 1995). For a modern-industrial precursor to this argument, see Simmel ([1907] 1971).
41. In a 2002 study of the “John School” program in Toronto, Wortley, Fischer, and Webster also found that relatively few of the program participants came from affluent or professional/managerial backgrounds. They similarly postulated that “the types of men who ultimately attend the John School program may reflect the demographics of the neighborhoods and individuals that are most often targeted by police ‘string’ operations and other antiprositution initiatives” (378). In a 2005 analysis of clients arrested for prostitution in Chicago during a four-month period, John Conroy evaluated arrest photos to conclude that of 524 images, more than 80 percent appeared to be African American or Hispanic. “Suburbanites and tourists accounted for less than one mug shot in five, and even in this group nearly three Johns in five were black or Hispanic. The wealthy suburbs north of Evanston had not a single representative” (Conroy 2006).
42. Ruth Rosen observed a split between the interests of large- and small-scale business owners earlier in the century, when large-scale business interests (real estate agents, landlords, and owners of saloons and breweries) supported organized brothel prostitution, whereas small shopkeepers opposed it (Rosen 1982: 77). This split seems to parallel contemporary trends.
43. Pheterson (1993: 44).
44. Marinucci (1995a and b), Kilman and Watson-Smyth (1998), Symbaluk and Jones (1998), Lefler (1999), Monto (2000), Nieves (1999), Weitzer (2000b), “Norfolk’s ‘John School’” (2005).
45. Hamilton (1999), Weitzer (2000b).
46. “Names” (1999), “Suburban Detroit” (1999).
47. Lewis (1999), Fowler (2003), McCord (2004), “Durham Police” (2004), “Convicted Johns” (2005), Conroy (2006).
48. Lefler (1999), “NSW” (1999), Weitzer (2000b), “Urban Warrior” (2004), Botonis (2004).
49. Castells (1996), Kempadoo (1998).
50. In cities other than San Francisco, the moral project of retaining a relational paradigm of sexual intimacy is one that is often shared by prominent factions of both feminist and evangelical Christian movements, and which has arguably contributed to the “strange bedfellows” phenomenon of their joint activism around prostitution. This overlap is apparent in the recent development of faith-based client intervention programs such as Operation Destiny in Danville, California. The program helps men to cease their engagement in “inappropriate” sexual behaviors, such as patronizing prostitutes, and to redirect their energies toward their families and God (Hughes 2004).
51. Weitzer (2000b).
52. San Francisco Task Force on Prostitution (1994).
53. See, e.g., Ehrenreich (1983), Juffer (1998).

CHAPTER SIX

1. For a discussion of the scope and profitability of the online sex industry in Amsterdam (the epicenter for Europe), see Davies and Wonke (2000).
2. As described by Linda Williams (1989), by the late 1970s, the “money shot” (i.e., the depiction of the external ejaculation of the penis for the sake of narrative climax) became a staple feature of hard-core pornographic film. Presumably, it is eliminated from live pornographic performances such as the one described in order to enable men to complete their four to six daily performances.
3. In November of 2005, the travel company Thomas Cook came under fire by feminist groups in the United States and Britain for launching guided family tours of the Amsterdam red-light district. The slogan “under threes go free” was purportedly featured in the company’s advertisements (Gallagher 2005, Hunt 2005, Bows 2005).
4. All three cities have approximately 750,000 residents and economies weighted heavily toward tourism, business and personal services, and high technology (Smith 1996, Milkman and Dwyer 2002, Swedish Institute 2001, Terhorst et al. 2003). My fieldwork consisted of sixty formal interviews with key figures involved in national prostitution debates (government officials, public

- prosecutors, social workers, police officers, academic specialists, feminist organizers, and sex-workers' rights activists) as well as on-site observations on streetwalking strolls, in brothels, bars, and massage parlors, drop-in centers, and other social service facilities. While the bulk of my research was conducted in Amsterdam and Stockholm, I also conducted some fieldwork in several smaller Dutch and Scandinavian cities (e.g., in Utrecht, Leiden, and the Hague in the Netherlands, and in Göteborg in Sweden), as well as in Oslo, Norway, and Copenhagen, Denmark. I have provided a fuller description of my research process in the methodological appendix.
5. Hobson (1987: 30).
 6. Gelb (1989: 138), Wolfe (1989), Lenner-Axelsson (1991a). As such, it is interesting to note that it is also a country in which there has been a marked absence of any strong or tangible second-wave women's movement. The relative gender equality that Sweden is noted for has been achieved not through the civil sphere but through the early incorporation of "women's interests" into formal government institutions. According to Hobson (1999), the downsizing of the Swedish public sector in the 1990s has, however, led to a recent spate of more vocal feminist activism.
 7. Hobson (1987), Jeffreys (1997), Boethius (1999), Farley and Kelly (2000).
 8. Hobson (1987), Chapkis (1997), Weitzer (2000b), Kuo (2002). "Harm reduction" refers to social-service approaches to prostitution and drug dependency that seek to reduce the associated harms without requiring the abolition of the sex industry or total abstinence by the drug user (Sorge 1991; Kilvington, Day, and Ward 2001).
 9. Legalized prostitution can also be found in Austria, Germany, Australia, and New Zealand, as well as in the state of Nevada. See Outshoorn (2004), Hausbeck and Brents (2000), Perkins et al. (1994), and Jordan (2005).
 10. See, e.g., Van Wesebeek (1995), Barry (1995), Alexander (1987), Leigh (1998), and Weitzer (2000b). Leigh (1998) articulates the differences between these models from a perspective that is akin to my own view, arguing that they merely represent "ideal types" within a field of highly complex configurations of policy.
 11. The fact that the United States is often held to be a nation that relegates most of its moral issues to regulation by the market (Wolfe 1989, Esping-Andersen 1990), yet officially prohibits the exchange of sexual services for payment, might at first blush appear to present a contradiction. Although theorists writing in the utilitarian tradition have often embraced market logics to argue against state intervention in prostitution, economic logics have also been used to justify its prohibition (Satz 1995). Barbara Hobson has described a tension in the United States between a commitment to free market principles and a tradition of intervention in moral concerns, thus explaining its history of "radical swings in policy between all-out campaigns against prostitution and sufferance of its existence" (1990: 4). On the exceptionalism of Nevada (historically rooted in a migrant mining economy and a culture of "cowboy," antifederalist libertarianism), see Hausbeck and Brents (2000).
 12. Hobson (1987), Høigård and Finstad (1992), Davis (1993).
 13. Less frequently, social work and reeducation programs have also attempted to target clients, as with the Swedish KAST project which began in 1997, featuring social workers doing outreach to male sexual clients and offering them counseling (Torgny Sjögren, KAST, interview, June 18, 1999). By the beginning of this decade, severe budget cuts in the Netherlands began to severely inhibit service provision of all sorts. The red-light district's Prostitution Information Center lost its government funding and the Mr. A. de Graaf Stichting, the Dutch research institute for prostitution issues, founded in 1961, closed its doors.
 14. Hobson (2005), Outshoorn (2004a, 2005), Kilgiman (2005), Kilvington, Day, and Ward (2001).
 15. Månsson (1981: 311), Jan Visser, Mr. A. de Graaf Stichting, interview, June 9, 1999.
 16. Definitional struggles over what constitutes the crime and human rights violations of "trafficking" continue to abound. The most recent United Nations Protocol against Trafficking in Persons defines trafficking broadly, to encompass multiple forms of forced migration and forced labor beyond prostitution (including, most commonly, domestic work, sweatshop labor, and agricultural work). Nevertheless, many antitrafficking activists and state agents deem trafficking to be synonymous with all forms of prostitution, whether forced or voluntary (see, e.g., Saunders 2004; Saunders and Soderlund 2004).
 17. On the conflation of feminism, nationalism, and antitrafficking sentiment in the passage of the 1998 Swedish law prohibiting the purchase of sex, see Kullick (2003) and Gould (2002). Joyce Outshoorn (2004b) and Mariëke Van Doornick of the Mr. A. de Graaf Stichting (interview, July 2002) have both noted the gap between Dutch feminist demands and state policies regarding the rights of illegal migrant sex workers. See also Doezema (1998) and Norwegian Ministry of Justice (2004).
 18. Interview, June 18, 1999.
 19. Månsson (1992: 10).
 20. *Violence against Women Fact Sheet* (1999).
 21. Within Sweden, variants of commercial sexual exchange that depart from the classical heterosexual exchange model of women offering services to men have been insufficiently acknowledged or understood. The crafters of a recent survey of online sexual services in Sweden were thus baffled to discover that of 2,668 entries, the majority of the sellers were men (National Board of Health and Welfare 1999).
 22. *Violence against Women Fact Sheet* (1999).
 23. Nordic Baltic Campaign (2002). On the relationship between the new Swedish law and the invention of a new category of "pervert" in Swedish society, see Kullick (2005).
 24. Since the 1960s and 1970s, the hallmarks of Swedish gender equality policy have included state-run child care programs and generous parental leave and pension systems which have allowed Swedish women to enter the labor force in record numbers. See Florin and Nilsson (1998), Earles (2004), Hobson (1999), and Rabo (1997). Beginning in the late 1970s, feminist-identified

- parliamentarians sought to intervene in the sexual arena as well. Through the 1980s, anti-pornography legislation was made stricter through successive bans on child pornography (1980), on sexual violence in films and videos (1986), and on sexual violence in pictures and print (1989) (Bygdeman and Lindahl 1994: 72). Feminist interventions in prostitution policy date back to 1977, when the government created its first “prostitution project,” sending a team of researchers and social workers to Malmö to investigate and to attempt to curb the prostitution explosion in one Swedish port city. The project gave rise to similar efforts in Göteborg, Stockholm, and Nookkjøping, and led to the government’s creation of the first national prostitution commission (Månsson 1981: 311). The report that was eventually issued by the commission resulted in a new national prostitution policy which aimed to address the problem both through legal measures and through expanded social services. In 1982, the law against vagrancy was removed from the penal code and was supplanted by several key policy revisions: profiteering (including newspaper advertising and the renting out of flats) was prohibited; pornographic “live shows” in places open to the public were banned; prostitution was criminalized for sellers under twenty years of age; and the Swedish government was required by law to fund research on methods of preventing prostitution (Swedish Prostitution Commission 1993; *Women and Men* 1995). For additional discussion of feminist interventions in Swedish sex law, see Kulick (2003, 2005).
25. Kulick (2003: 207).
 26. The results of the referendum vote by which Swedish voters elected to enter the European Union were closely divided: 52.2 percent of voters were in favor, and 46.9 percent of voters were against (Kulick 2003: 214 fn. 15).
 27. Månsson (1992: 8).
 28. Swedish Prostitution Commission (1993: 3–4). The 1993 committee initially recommended the criminalization of both the buyer and the seller, arguing that bilateral criminalization would have the greatest general deterrent effect. This proposal was rejected by virtually all government parties consulted, largely on the grounds that women who were already victimized by prostitution should not be made to suffer further penalties (Norwegian Ministry of Justice 2004; interview with Anne Rygh Pedersen, Swedish Social Democratic Party, July 22, 1999).
 29. See, e.g., Boethius (1999), Farley and Kelly (2000), and Raymond (2003).
 30. Winberg (2002), Ekberg (2002), Swedish Ministry of Foreign Affairs (2003), Orback (2005).
 31. Before the passage of the new law, there were never more than 1,000 street prostitutes in all of Sweden, even according to the most liberal estimates (Kulick 2003: 200), with street prostitution constituting no more than a third of the overall market (Norwegian Ministry of Justice 2004). Data collected through the 1990s reveal that approximately one quarter of Swedish prostitutes were migrants, compared to upward of 50 percent and as much as 80 percent in countries such as the Netherlands and Germany (Randers-Pehrson and Jessen 2000: 1; TAMPEP 2002: 243ff).

32. Unlike in the United States, even the use of police decoys is considered entrapment. As of 2001, the police had made eighty-six arrests and twenty convictions (Anders Gripelov, head of the Prostitution Patrol Force, interview, July 8, 2002).
33. Pettersson and Tibby (2003: 163). Another definitional difficulty is entailed by the Swedish law’s equation of the crime of prostitution with the purchase of a “temporary sexual relationship.” (“Anyone who for remuneration procures a temporary sexual relationship will be guilty—if their action is not punishable by some other offense according to the penal code—of purchasing sexual services, and will be sentenced to fines or prison for not more than six months”) As Kulick rightfully inquires: “What does ‘temporary’ mean exactly? Should it cover regular clients, who maintain long term relationships with individual sex workers, or are they exempt from prosecution? And . . . what exactly constitutes ‘a sexual relationship’? . . . what exactly has to be done to whom for a given interaction to be considered ‘sexual?’” (2003: 202).
34. Pettersson and Tibby (2003: 154).
35. The Swedish police have been involved in only one case which involved sex purchased indoors. In a 2003 case associated with trafficking, a list of clients was found by the police while going through the computer records of a Stockholm brothel. Due to strict laws against entrapment, the police conduct no undercover operations in brothels—whether or not trafficking is suspected (Norwegian Ministry of Justice 2004: 10).
36. Swedish “company clubs” are the approximate equivalent of “gentleman’s clubs” in the United States.
37. On the law’s exclusion of Swedish sex workers from city streets, see also Östergren (2004); on the spatialization of social hierarchy in Sweden, see Fred (2000).
38. Roane (1998), Israily (2000), Davies and Wonke (2000).
39. The penal code provides that a person “promoting or improperly deriving economic advantage from another person having casual sexual relations in return for payment can be convicted of procuring and imprisoned for up to four years. . . . Procuring can include, not only the more traditional activities of the pimp or the panderer, but also other forms of promotion such as sex advertisements in newspapers, travel arrangements and so on. Special penal liability—the same as for procuring—is incurred . . . by a property owner when a tenanted apartment is used for prostitution” (Swedish Prostitution Commission 1993: 3).
40. As Tanya explained to me, “For a Swedish girl working by herself, it’s usually 1,500 [kronor] for an hour of services. Sometimes, on the street, the client would be able to bargain her down to 1,000 kr. Now that it’s only drug addicts left on the street, the price has gone way down. A blow job was usually 500 kr. So when I started to employ Swedish girls, I would charge 1,500 to 3,000 (for a half hour or one hour), and take half. Now if I want to make the same profit with the Estonian girls, I pay 500 kronor per girl, which leaves 750 for me for a half hour date. The meeting costs the client 1,250. So it’s slightly cheaper for him, and he gets a higher quality girl. For a one-hour

date, the price is 1,600 to 2,500. The girl gets 500 for half an hour, and 800 for one hour. But actually, I have found that the girls are happy with even less, anywhere from 300 to 500, so I have started paying that.” At the time the interview was conducted, the exchange rate was approximately 9 kronor to the dollar. Thus, each woman would earn approximately \$30 to \$50 for a half-hour date, while Tanya would earn \$80. For an hour date, the women whom Tanya employed would earn approximately \$90, and Tanya would earn \$180.

41. For an ethnographic account of some of the conditions that propel Latin American transvestite prostitutes to seek employment in the European sex industry, see Kulick (1998).
42. In anticipation of the law’s passage, the city of Amsterdam began to officially regulate prostitution through a system of licenses in 1996 (Mr. A. de Graaf Stichting 2004).
43. Van Oostveen (1997).
44. Visser (1997: 4).
45. TAMPEP (2002), Outhoorn (2004b).
46. Although the women had technically been working illegally even before the passage of the new law, their places of employment had not been regularly policed.
47. Interview with Kersten Van Dalen, night manager of the Amsterdam *huis-kamer*, October 9, 2003; “Rotterdam Shuts Door” (2004); van Soomenen (2004).
48. Hugo, Dutch Association of Sex Club Owners, interview, July 1999; Yvonne, spokesperson for the Excellent Group (Dutch Brothel Owner’s Association), interview, July 18, 2002.
49. Brants (1998: 624).
50. Marieke Van Doorninck, Mr. A. de Graaf Stichting, interview, July 18, 2002; Licia Brussa, TAMPEP (Transnational AIDS/STD Prevention among Migrant Prostitutes in Europe), interview, July 8, 2003.
51. Van Doorninck, interview, July 8, 2002.
52. Doezema (1998: 42). A cogent critique of the “forced vs. voluntary” distinction in prostitution policy has also been provided by Chapkis (2005).
53. Van Doorninck, interview, July 18, 2002.
54. Randers-Pehrson and Jessen (2000: 1), TAMPEP (2002: 242). Providing precise statistical counts of sex-industry workers is notoriously difficult, as numbers are generally gleaned from police or social workers; using official counts of identifiable prostitutes as measures of the size of the sex industry in general presents even greater difficulties. Nonetheless, the numbers can serve as a rough portrait of differences in the scope and character of sexual commerce in diverse contexts.
55. See, e.g., Walkowitz (1980), Beisel (1997), Luker (1998), and Brown (1995).
56. The sexualization of public culture has also inspired antiprostitution activism on the part of women’s organizations that do not consider themselves feminist. Evangelical Christian women have historically played an active role in

shaping prostitution policy not only in the United States but also in countries such as Norway, Britain, and the Netherlands (Hobson 1987).

CHAPTER SEVEN

1. The “Economic Justice for Sex Workers” Symposium took place at the University of California, Hastings College of the Law in San Francisco, California, on March 28, 1999. For a summary of the proceedings, see Shah (1999).
2. In similar fashion, contemporary struggles within queer politics and theory over questions of assimilationism—e.g., the pursuit of marriage or other forms of state-recognized, rights-endowed partnerships, versus the celebration of a “public” sexuality that is unmoored by durable romantic attachments—are conflicts that have emanated from the dramatic and multifaceted cultural changes that have taken place in postindustrial societies since the late 1960s. Pertinent discussions of the queer “pleasure wars” include Pendleton (1996), Warner (1999), and Crain (1997).
3. On the meaning of recent cultural struggles around gay marriage and gay rights, see Seidman (2005), Chauncey (2004), and Stein (2001). On abortion wars, see Luker (1984), Ginsburg (1989), Petchesky (1990), and Saletan (2004). On the sociological significance of contemporary debates around sex education in schools, see Irvine (2002) and Luker (2006).
4. The term “moral panic” was first deployed by British sociologist Stanley Cohen (1972) and has been used by recent theorists to describe the anxieties that crystallize in the political and cultural field over particular constellations of sexual behaviors, often resulting in severely punitive responses from the state. See, e.g., Rubin (1989), Duggan and Hunter (1995), Warner (1999), and Stein (2001).
5. Durkheim (1901 1982), Bourdieu and Wacquant (1992).
6. Rosen (1982: 173). Italics in original.
7. Kempadoo (1998), Agustín (2000: 2), Brennan (2004: 27), O’Connell Davidson and Sánchez Taylor (2005).
8. Acker (2002), Gilfoyle (1992), Ullman (1997).
9. Gilfoyle (1992: 18).
10. Gilfoyle (1992: 102), Chudacoff (1999: 38).
11. Stansell (1982), Peiss (1989).
12. Stansell (1982: 185).
13. See Griffin (2001), Dalby (1983), Downer (2001), and Ramberg (2006). Indeed, many contemporary sex workers have themselves sought to elicit the comparison between the GFE and these earlier modes of commercial sexual engagement, creatively blending pre- and postmodern elements in their self-descriptions as “tantric sex practitioners” or “modern day courtesans.” The Web site of one sex-worker activist of Indian descent notes that she offers “an in-call and out-call service for professional clients who are seeking a girl friend experience with a genuinely affectionate Devadasi escort.”
14. Norberg (1998).
15. Stanford (1966: 72), quoted in Rosen (1982: 94).