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## Women of the West: Prostitutes and Madams

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## WOMEN OF THE WEST: PROSTITUTES AND MADAMS

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## WOMEN OF THE WEST: PROSTITUTES AND MADAMS

America has never been, as a nation, stationary. The settlement of the American West in the 19<sup>th</sup> century was inevitable with American belief in “Manifest Destiny” and past patterns of movement and expansion. In the 1890s, as concluded by Frederick Jackson Turner, “for nearly three centuries the dominant fact in American life has been expansion.”<sup>1</sup> This inherent American drive for expansion led the way for the settlement of the west and new possession of California, Texas, New Mexico, and the Oregon Country under President Polk gave the means. The attraction of the American West lay in its enterprise that seemed to be bursting naturally from its seams. The discovery of gold in California only served to validate that wealth could be extracted from the rich, beautiful land. The western industries that functioned for this purpose consequently brought overwhelmingly male populations of settlers, as workers were needed to complete laborious and strenuous physical tasks. Lumbering, mining, freighting, and cattle-driving were the main industries. The nature of which caused women to be relatively excluded

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<sup>1</sup> Linda Peavy and Ursula Smith, *Women in Waiting in the Westward Movement* (Norman: University of Oklahoma Press, 1994), ix-x.

from the vast pool of western employment opportunities.<sup>2</sup> Even occupations in clerical receptionist or typist jobs and office jobs failed to open themselves to the female work force at the time. Low status jobs as seamstresses, maids, waitresses and schoolteachers were of the few available, but failed to offer satisfactory wages. For this reason, among others including familial ties, some women remained as “waiting ladies” at home. However, despite the restrictions and feelings of hesitancy, with the draw of adventure, the prospect, however slim, for economic prosperity, and the change in scenery, immense female migration to the American West continued alongside male counterparts and a uniquely female institution found promise and flourished. Of the female pioneers -single, married, widowed, or divorced- some found prostitution as the best form of work (or supplementary form of work) to make a living. These women who travelled, settled and worked the American Frontier in the 1800s became known under a plethora of titles, “Soiled doves,” “painted ladies,” “fallen angels,” “filles de joie,” “frail sisters,” “nymphs of the prairie,” and “whores.”<sup>3</sup> By the late 19<sup>th</sup> century it was estimated that there were over 50,000 of these women in the trans-Mississippi West alone.<sup>4</sup>

To paint a more detailed picture of these soiled doves, one must first understand the lives they lived on the frontier. The women themselves varied immensely. Ages for prostitutes ranged from the mid-teens to women into their 40s and 50s. For the younger women it seems, prostitution had the added appeal of excitement, Laura Evens of Salida, Colorado, admitted to

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<sup>2</sup> Anne M. Butler, *Daughters of Joy, Sisters of Misery: Prostitutes in the American West 1865-90*. (Urbana and Chicago: University of Illinois Press, 1984), 2.

<sup>3</sup> “Painted Ladies of the Old West” [article on-line]. Legends of America, 2016, accessed January 2018; available from <https://www.legendsofamerica.com/we-paintedlady/>; Internet.

<sup>4</sup> Butler, xvii.

being a party girl enticed by the thrill it brought, “I was pretty young when I first became a sporting woman,” she recalled, “and loved to sing and dance and get drunk and have a good time.”<sup>5</sup> Others, like Mattie Silks, of Denver, Colorado, who opened her first brothel in Illinois at age 19, claimed they “went into the sporting life for business reasons and for no other. It was a way for a woman in those days to make money, and I made it.”<sup>6</sup> Besides motivation and age, race varied immensely as well. White women, African American women, Native American women, Chinese Women, European Women, and Hispanic women were among many of the different types of prostitutes; for alien women, prostitution was a viable option to maintain employment after immigration. Race also became a factor in success with customers, as prices for services often depended on it. Native American and red-headed women were often priced higher because of a belief that they were more “amorous” and exotic.<sup>7</sup> As the need and desire for more women grew in the west, European girls were recruited to be shipped to America. Speaking very little, or no English, and being uneducated, they too fell to prostitution when few could find domestic jobs or husbands. Despite vast differences in the background and makeup of the women, their one unifying aspect was of course, their occupation. Though even within prostitution there existed ranges.

While the majority of workers remained at a relative “entry level” or showgirl status, some women scaled the ranks, opened their own brothels and inns, capitalized on the industry

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<sup>5</sup> Jan Mackell, “Soiled Doves: An Overview of Good Girls Gone Bad in the American West” [article on-line]. (True West Publishing, 2013, accessed 13 January 2018); available from <https://truewestmagazine.com/soiled-doves/>; Internet.

<sup>6</sup> *Ibid.*

<sup>7</sup> Butler, 27.

and became known as “madams.” Common ladies existed within two distinct categories. The first being women very explicitly offering sexual acts in saloons, brothels, parlor houses and cribs. The second, more “respectable” type was known as a “saloon” or “dance hall girl” who kept male customers company, solicited drinks, and made the atmosphere enticing for men craving female partnership. As men outnumbered women three to one, or more extremely outnumbered them nine to one in California by 1850, female attention, whether that female was “respectable” or not, was in high demand.<sup>8</sup> “The mere mention of a bonnet on the streets of Denver in 1859 brought Argonauts bolting to their doors, and a youth in another Colorado mining camp paid twenty dollars in gold dust for the initial pancake made by the region’s first unmarried woman.”<sup>9</sup>

Whether a woman was a Madam or common “painted lady,” it mattered not in terms of location. Through the years of 1865-1890, prostitutes lived in all the urban areas.<sup>10</sup> These populated urban areas were known as the “red light districts.” As such, they contained all the amenities of a city, theaters, saloons, and characteristically brothels. The smaller mining towns and “whistle stops”<sup>11</sup> often developed into these roaring and bustling red-light districts which then, from the economic benefits prostitution provided by way of fees, licenses, and fines,

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<sup>8</sup> “Painted Ladies of the Old West” [article on-line]. (Legends of America, 2016, accessed January 2018); available from <https://www.legendsofamerica.com/we-paintedlady/>; Internet.

<sup>9</sup> Anne Seagraves, *Soiled Doves: Prostitution in the Early West* (Hayden: Wesanne Publications, 1994), 23.

<sup>10</sup> Butler, 4.

<sup>11</sup> Small towns with basic components along longer, larger travel routes and rail lines.

became social centers of their areas.<sup>12</sup> Women in these towns lived in brothels and parlor houses as “boarders” under the same roof run by their madam. They would pay for their room and board, which often consisted of a single room with a single window and give half their fee earned a night to the madam, keeping tips for themselves. In smaller mining towns or less wealthy areas, \$10 for a night’s services was considered average, while in more populated and wealthier sections of places like Seattle or San Francisco, \$50 or more would be expected.<sup>13</sup> Parlor houses in more wealthy areas were well furnished and especially well taken care of. The women, too, working out of these houses were better taken care of and enjoyed extra commodities given to them by their madam. Often their appearances were regulated by the Madam of the house, as she was in charge of selling them. In advertising the women, Madams would tell their girls to dress up, though the glamour of their outfit was often limited as the purchase of it was the expense of the woman wearing it, and promenade local parks and walk dogs to attract attention.<sup>14</sup>

Prostitutes characteristically wore dresses, corsets, stockings and jewelry. Their appearance which often included makeup, was considered fairly scandalous and characteristic of their sexual vocation. Ladies working in the saloons and dance halls wore brightly colored garments made of silk and/or lace. Often, they were decorated with frills, sequins, or tassels. Bodices were low cut and revealing and left the shoulders and arms bare. The skirts and dresses

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<sup>12</sup> Mackell.

<sup>13</sup> Seagraves, 26.

<sup>14</sup> *Ibid.*, Poodles were given to the girls during their advertising walks. The poodle as a breed then became a symbol of western prostitution, not only alerting potential customers to the services, but causing the breed itself to be looked down upon by non-prostitute women.

that they wore were to the knee (this was considered short enough to be scandalous at the time). While overwhelmingly their dress was considered provocative, in some places the women were required to wear extra items in order to preserve modesty. As made clear by a photograph of a typical saloon in Cripple Creek, Colorado, both prostitutes and dance-hall girls wore aprons down to their ankles over their dresses.<sup>15</sup>

Ladies, while working in saloons were received well by the men surrounding them. Wealthy men would shower them with gifts. The garters prostitutes wore were often gifts of their most loyal customers.<sup>16</sup> Returning customers were gracious with their payments. Men generally acted with the utmost respect towards all women of the time, and this respect carried over to the women despite their occupation in the sex industry. Mary Mathews, a non-prostitute middle class woman from Colorado, admittedly claimed, "Sometimes a good citizen, wealthy and respectable, marries his wife from some of these corrupt houses, and he seldom ever regrets his choice. He builds her up to be respected and respectable. I have heard of several cases."<sup>17</sup> Prostitutes were respected and desirable enough for wealthy and well renowned men to take their hand in marriage. Even if this respect did not result in lifetime partnership, it was expected that men show these women common courtesies. Mistreatment towards a woman would at least render the perpetrator a social outcast.<sup>18</sup> Brothels and saloons were also expected to uphold a certain

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<sup>15</sup> "Painted Ladies of the Old West."

<sup>16</sup> *Ibid.*

<sup>17</sup> George M. Blackburn, and Sherman L. Richards. "The Prostitutes and Gamblers of Virginia City, Nevada: 1870," *Pacific Historical Review*, 48:2 (1979), 241.

<sup>18</sup> "Painted Ladies of the Old West"



amount of decency as they were most often also places of business. Publicly, brothels operated “at the nexus of social relations in the nineteenth-century city.”<sup>19</sup> Business meetings and deals between men were often held outside of the office place. In the brothels and saloons, deals were made, and economic advantages gained by “showing clients a good time... shared sexual entertainment deepened male fellowship and helped cement business relationships, much like the golf course does for the twentieth century.”<sup>20</sup> Besides entertaining customers, prostitutes in brothels worked to essentially create a public forum for economic discourse and development among businessmen and investors of the time.

Despite an expectation of decency and respect, there were still inevitable cases of violence and exclusion. While commerce with wealthy businessmen usually resulted in loyalty and gifts, rowdy or drunk cowboys and men caused some of the dancehall girls to carry a knife or small pistol in a pocket sewn into their boot.<sup>21</sup> Prostitutes would go missing or be blatantly killed, though Madams were especially victim to murder and business sabotage. Madam “Belgian Jennie” Bauters moved from Arizona southwest to a town called Kingman where in 1905, her ex-lover shot her three times, reloaded his gun and, “observing she was not dead yet,” as reported by the *Mohave Country Miner*, “he moved her head so that he could get a better shot and then deliberately fired the pistol into her head.”<sup>22</sup>

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<sup>19</sup> Timothy J. Gilfoyle, *City of Eros: New York City, Prostitution, and the Commercialization of Sex, 1790-1920* (New York, New York: WW Norton and Company, 1992), 462.

<sup>20</sup> Elizabeth A. Topping, *What's a Poor Girl to do? Prostitution in Mid-Nineteenth Century America* (Gettysburg, Pennsylvania: Thomas Publications, 2001.)

<sup>21</sup> “Painted Ladies of the Old West”

<sup>22</sup> Mackell.

Severe violence that appeared almost vengeful was not unheard of among the women. However, most opposition towards the women manifested as discrimination from other women living on the frontier who did not partake in the sex industry. Prostitutes who worked their whole lives, starting in prostitution during the teenage years and continuing to work until death, however early, without progressing to madam status working for the lower value brothels rarely made enough profit to retire and resorted to suicide, and drugs (leading to drug overdose).<sup>23</sup> Others fell victim early to failed abortions or sexually transmitted diseases like syphilis and chlamydia, that were widespread during the entirety of the 19<sup>th</sup> century. According to a report from a hospital in Idaho in 1865, one out of every seven patients (both men and women) were suffering from a sexually transmitted disease.<sup>24</sup>

Despite suffering from a sizable amount of lawless activity and deplorable acts, the soiled doves were not outside the law. Instead, they found themselves rather at home within the courts and very capable of working regulations in their favor for their industry's survival. The women's success at gaining some support, or if not "support" then at least ignorant tolerance, on behalf of the law officials can be somewhat attributed to bribery. Bribes and close relationships between prostitutes, Madams and high officials were far from uncommon at the time. In Boise, Idaho, a prominent Madam, Agnes Bush, was known for giving lavish gifts to men. C. Miles, a well-known newsreporter of the area admitted to visiting her brothel and receiving a diamond ring, claiming he "would be a chump if [he] did not take a \$250 diamond," though he denied it being a bribe and insinuated it was a gift of gratitude for saving her from being beaten earlier.<sup>25</sup> Though

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<sup>23</sup> "Painted Ladies of the Old West"

<sup>24</sup> *Ibid.*

this instance of this close relationship between public officials was quite overt, many other instances of bribery were rumored or kept quiet. The mayor of Boise was charged soon after with taking \$100 a month from the local Hoffman House brothel in order for the brothel to remain open. The closure of the brothel would have resulted in the movement of the girls elsewhere besides their current contained position in a designated “alley.” At the end of the investigation, more accusations had surfaced, yet no Boise officials were charged with misconduct despite evidence,<sup>26</sup> pointing to a broad social acceptance of some unjust action by officials on account that they keep social outcasts and operating prostitutes out of public discourse as well.

In addition to manipulation on a personal level, prostitutes were able to find a sense of power with the law on the county court level. Prostitution was by no means a legal endeavor. In fact, all city councils in the West passed laws prohibiting the existence of brothels in cities and proposed taxation to “punish it,” knowing very well the large number of brothels would not substantially decrease and provide a steady tax revenue for the city.<sup>27</sup> According to the City of Cheyenne Jail Register, 2 March 1887 to 1 January 1880, in a three month period during 1887, the register showed a total of \$1,028.50 obtained solely from prostitution fines. As exemplified by the city of St. Paul, Minnesota, Prostitution was made illegal by state law and city ordinance, the enforcement of this law was undertaken by arresting the city’s madams at regular monthly intervals and fining them according to the number of women in their brothels, as evidenced by

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<sup>25</sup> Butler, 87.

<sup>26</sup> *Ibid.*

<sup>27</sup> *Ibid.*, 100.

arrest records and courthouse appearances.<sup>28</sup> This regular income for the city was in effect, a form of taxation. This substantial and consistent income on behalf of the city contributed to its own ability to construct city buildings and maintain facilities and law institutions themselves. Outside of St. Paul, this system prevailed around the country. Prostitution itself was illegal by the two ordinances, not just the existence of houses for it, and because of the vice activities that usually accompanied it, misdemeanors for swearing, indecent exposure, mischief, vagrancy, drunkenness, and disturbing the peace could all be filed as additional charges.<sup>29</sup> The irony of these charges is in the execution of the fines for them. Prostitutes were allowed to leave court to earn the money to pay their fine *by engaging* in prostitution, as demonstrated in the city of Canadian, Texas where it was common to “put a deposit down” and turn to the streets to earn the rest.<sup>30</sup> This inherently pointed to the fact that prostitutes were effectively outside of the law. They held a dual identity in the West as both criminals and citizens. It was this dual identity that the law institutions drew upon to enlarge themselves through exploitive monetary gains that the public would overlook because of the morally inferior position of prostitutes in society.

The instability of the law and the lack of reputability was evident by these instances of corruption and insufficient action. So inevitably, besides the lower judicial courts of the West and their inconsistent implementation of the laws that did exist, there was an inherent need for physical means of protection. Due to the vast amounts of sheer unknown territory surrounding growing western towns and industries as well as Native peoples, the stationing of enlisted

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<sup>28</sup> Joel Best, "Careers in Brothel Prostitution: St. Paul, 1865-1883," *The Journal of Interdisciplinary History*, 12:4 (1982), 610.

<sup>29</sup> *Ibid.*

<sup>30</sup> Butler, 101.

Americans in the west grew immensely during this time. Pre-existing pre-Civil War posts were revived, and more than eighty-five new military garrisons were constructed and then employed between 1865 and 1890. Around 8,400 men were stationed at posts in the Trans-Mississippi region alone in 1850, a number that doubled by the 1890s.<sup>31</sup> With this large population of enlisted men, living solely among men, prostitution found new clientele outside of the laborers and workers visiting red light districts. Military officers so often engaged in saloon behaviors, gambling drinking and hiring prostitutes, that in 1869, General Military Order #72, from the Office of the Adjutant General was revised to state, “Laundresses will be allowed to each company or detachment of twelve or more enlisted men to do the washing for the company or detachment.”<sup>32</sup> “Laundresses,” along with “matrons,” “nurses,” “female attendants,” “followers of the army,” and “camp women” served as interchangeable terms for the prostitutes in the effective execution of the military order. So many terms kept “identification of female roles confused and permitted officials to avoid any direct acknowledgement... on military grounds.”<sup>33</sup>

Despite this attempted justification, local papers still took critical notice of the men. The *Butte Miner*, a popular newspaper in Montana at the time, commented on the increasing number of officers taking part in vice activities in Dakota Territory at Fort Meade, writing in 1879 that: “investigation brought out... young officers... are weakening their bodies, ruining their morals and destroying their intellects by midnight carouses, excessive drinking and indulgence in a

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<sup>31</sup> *Ibid.*, 125.

<sup>32</sup> Butler, 140.

<sup>33</sup> *Ibid.*

dozen other forms of enervating dissipation.”<sup>34</sup> This obviously critical opinion of such behavior and the overall institution of prostitution was shared by the army to the same degree. Officers in the military (who themselves were likely involved to some degree in prostitution) described to a newspaper their opinion on the sinful indulgences of enlisted men very similarly to the *Butte Miner* in 1879.<sup>35</sup> In 1918, a military officer warned officials in Montana that,

Our health tests have proven that if a potential recruit spends twelve hours in Billings, he’s unfit for military service. I am talking about your line of cribs where naked women lean over window sills and entice young boys in for fifty cents or a dollar. Close that south-side line in twenty-four hours of the military will move in and do it for you.<sup>36</sup>

The US military in the frontier universally and publicly denounced the solicitation and engagement in prostitution and saloons all the way into the 20<sup>th</sup> century. However, the policies put in place contradict this (such as General Military Order #72) and are evidence that they were not effective at reducing military solicitation of prostitution if the issue was still being discussed into the early 1900s in papers such as the *Butte Miner*. Whether these policy changes to legitimize and excuse the military’s relationship with the local women were made because of the inevitable nature of prostitution under the circumstances or because of an underlying acceptance and desire for the industry cannot be determined and is relatively unimportant. The military’s de facto policy towards the prostitutes only served to please lonely officers and reinforce the courts’ system.<sup>37</sup> The American military’s cycle of employment followed by ostracizing reinforced the

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<sup>34</sup> *Ibid.*, 133.

<sup>35</sup> According to Butler, 146, “it was evident that every level of officer knew fully about the transport, presence and residence of prostitutes in and around military reservations”

<sup>36</sup> “Painted Ladies of the Old West.”

dual identity of prostitutes as both lowly criminal and purposeful citizen, the identity that courts and legislation exploited to catalyze their growth in the Western frontier.

This repetitive cycle also worked to infuse the local economies with “new money” outside of local circulation of currency. With the enlisted men came large amounts of spending money to be used on “whores and whiskey” since room and board needs were already met by the U.S. army. This money spent in the brothels and saloons was paid to workers and madams and then spent on separate industries.<sup>38</sup> As the “middle-men” receiving this money, prostitution fed and therefore grew a vast portion of the economy with the military’s vice expenditures.

By the early 1900s, with the western territories joined into a united nation, the institution of prostitution began to fade from the forefront of society. Its demise began as increased business regulations forced brothel owners and madams to close when operations became too difficult to continue. The physical dangers of engaging in prostitution also might have contributed to its decrease in popularity as more women realized the life altering consequences. In addition to these factors, new movements also made the line of work less desirable as the Women’s Christian Temperance Union, formed in 1875, increased its influence. More and more women from the eastern home fronts travelled to reunite with their husbands. Upon their arrival, feelings of disgust, and therefore increased aversion and social discrimination towards prostitutes, were inevitable as they saw what services their men had been partaking in. Women who worked as prostitutes were rarely forgiven of their past. A woman who left her brothel home to work as a

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<sup>37</sup> Butler, 153.

<sup>38</sup> Courtney Manning, “Prostitution’s Positive Role in Society,” Southern Adventist University, (2014.) Student Research. Paper 4.

domestic in cleaning and cooking was fired when her employers learned of her past field of employment, “she left the house at 10 o’clock at night, without shelter or friends, after ten months of faithful service and earnest strivings to do right.”<sup>39</sup> Despite prejudices, this genuine altruistic characteristic of prostitute women “to do right” was recognized. A “respectable” middle class woman from Virginia attested that:

This class of women is always very kind-hearted, and gives liberally to any charitable purpose, and is always ready to assist the poor and suffering. It seems as if they wish to atone for their many sins by doing all they can by way of charity, for “charity covert a multitude of sins.”<sup>40</sup>

While the focus of the woman speaking is more on the cause of their altruism (perhaps for moral forgiveness for their immoral ways), the exact form of their charity, and importance is left out. Famous Madams such as Mattie Silks netted an income of about \$38,000 (about \$1 million today) and were known for using that wealth to fund the creation of schools and churches and house and care for the needy and homeless in their brothels.<sup>41</sup> Another Madam, Lou Graham from Seattle, Washington built up a prosperous brothel, became “Queen of the Lava Beds” and allegedly “one of the largest landholders in the Pacific” by investing heavily in real estate and the stock market. With her successes, she gave large sums of her profit to the public-school system in Seattle and kept affluent bankrupt families afloat after the 1893 economic crisis. Anna Wilson, a madam in Omaha, donated her large deeds of real estate towards the end of her life, one of which being her twenty-five room mansion which became the Omaha emergency hospital and

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<sup>39</sup> Best, 57.

<sup>40</sup> Blackburn and Richards, 243.

<sup>41</sup> “Painted Ladies of the Old West”



disease treatment center.<sup>42</sup> Their generosity often took these physical forms that benefited society at large, however the moral depravity seen in the line of work fueled social repulsion.

Prostitution was regarded as “the foundation of crime and pauperism,”<sup>43</sup> not as an essential or beneficial industry. This moral judgment skewed objectivity in terms of prostitution’s effect on the socioeconomic development of the West, however “that their contributions appear less ‘good’ or ‘noble’ does not make them less important.”<sup>44</sup>

Because of prostitution, though indirectly, and the growth of “Red Light Districts,” the Prohibition Act was established in 1919, outlawing the consumption and sale of alcohol as more and more people began to rally against behaviors associated with vice and lawlessness. It affected the legality and popularity of the West’s “red light districts,” further reducing the demand for and appeal to engage in sex work, effectively putting prostitutes out of business. With an increased population in the west and more law institutions, something that can be attributed to prostitution, the Prohibition Act was enacted and enforced, a development in the America’s social and moral structure that arose from a desire to end places where prostitution and vice flourished. Also beginning in 1909, “red light districts” were confronted with further legislation, “The Red-Light Abatement” or “Injunction and Abatement Law,” a law that disallowed the existence of brothels explicitly and made renting apartments more discriminatory

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<sup>42</sup> Thaddeus Russell, “How 19<sup>th</sup> Century Prostitutes Were Among the Freest, Wealthiest, Most Educated Women of Their Time.” [article on-line] Alternet, 2010, accessed February 2018; available from [https://www.alternet.org/story/148327/how\\_19th\\_century\\_prostitutes\\_were\\_among\\_the\\_freest,\\_wealthiest,\\_most\\_educated\\_women\\_of\\_their\\_time](https://www.alternet.org/story/148327/how_19th_century_prostitutes_were_among_the_freest,_wealthiest,_most_educated_women_of_their_time); Internet.

<sup>43</sup> George R. Knight, *Ellen White's World*, (Hagerstown, MD: Review and Herald Publishing Association, 1998), 144.

<sup>44</sup> Butler, 181.

towards women to prevent prostitution (as well as other restrictions). These laws that were “clearly police legislation” were enacted because of continued discussion over the question, “can the Attorney General or designated citizens seek to enjoin acts which do not injure specific property, and where no pecuniary interests are involved?”<sup>45</sup> Instead of having to show “personal injury,” citizens could now exclude prostitution from a property by the newly broadly defined public nuisance laws. Though these laws were created against the institution of prostitution and it suffered because of them, the institution of law itself in the West was strengthened. Legal precedents were created and contested legal and moral questions such as the aforementioned were settled and made consistent across the United States. In one decade, by 1919, the Abatement Laws had quickly spread from only Iowa to 41 states.<sup>46</sup>

This is not to say that prostitution ended completely in the American West. The institution of prostitution existed preceding the times, flourished and became an integral part of frontier life and frontier development, then faded from popularity. As put by Dora Topham, one of the leading Madams in Utah, “I know, and you know, that prostitution has existed since the earliest ages, and if you are honest with yourselves, you will admit that it will continue to exist, no matter what may be said or done from the pulpit or through the exertions of women’s clubs.”<sup>47</sup> Despite the increased societal disapproval and circumstances (such as government acts) that caused prostitution to return to its pre-western state in the background, the major economic,

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<sup>45</sup> “Red Light” Injunction and Abatement Acts,” *Columbia Law Review*, 20:5 (1920): 605-08.

<sup>46</sup> *Ibid.*

<sup>47</sup> “Painted Ladies of the Old West.”

legal, and social contributions remained and the “Painted Ladies” importance to the American West itself should never be forgotten.

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