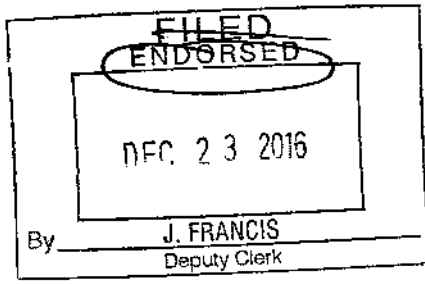


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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 IN AND FOR THE COUNTY OF SACRAMENTO

13 **PEOPLE OF THE STATE OF CALIFORNIA,**
14
15 Plaintiff,
16 v.
17 **1. CARL FERRER**
(DOB: [REDACTED]) (Xref # [REDACTED])
18 **2. MICHAEL LACEY**
(DOB: [REDACTED]) (Xref # [REDACTED])
19 **3. JAMES LARKIN**
(DOB: [REDACTED]) (Xref # [REDACTED])
20
21
22 Defendants.

Case No. 16 FE024013

FELONY CRIMINAL COMPLAINT

Date: January 11, 2017
Time: 10:30 a.m.
Department: 8

23 I, the undersigned, say on information and belief, that in the County of Sacramento, State of
24 California:

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27 ///

1 **COUNT ONE**

2 **(Penal Code sections 182/186.10, MONEY LAUNDERING CONSPIRACY)**

3 On or between January 1, 2013 and September 1, 2016, in the County of Sacramento and
4 throughout the State of California, **DEFENDANTS FERRER, LACEY, and LARKIN** did
5 unlawfully commit the crime of CONSPIRACY in violation of section 182(a)(1) of the Penal
6 Code in that said Defendants did unlawfully conspire together with each other and with others
7 whose identities are known and unknown, to commit the crime of money laundering, in violation
8 of section 186.10 of the Penal Code, a felony; and that pursuant to and for the purposes of
9 carrying out the objectives of the aforesaid conspiracy, the said Defendants committed the
10 following overt acts, throughout the alleged time period:

11 **Overt Act 1**

12 Defendants owned and operated multiple websites, including Backpage.com.

13 **Overt Act 2**

14 On August 27, 2013, Defendant Ferrer notified Backpage personnel that customers'
15 payment attempts were being denied and credit processors were refusing to process
16 Backpage transactions because of overtly sexual content and questionable practices.

17 **Overt Act 3**

18 Defendants created the company, Classified Solutions, LTD.

19 **Overt Act 4**

20 Defendants created the company, Website Technologies, LLC.

21 **Overt Act 5**

22 Defendants created the company Postfaster LLC and made Nathan Kopecky, Backpage's
23 Chief Financial Officer, the President.

24 **Overt Act 6**

25 Defendants applied for merchant accounts for said companies.

26 **Overt Act 7**

27 Defendants created multiple classified sites including Ymas, Postfastr, and Truckrjobs.

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1 **Overt Act 8**

2 Defendant Ferrer applied for a merchant account with the payment processor Stripe for the
3 classified site Postfastr.com. He omitted any reference to Backpage.com, but planned to use
4 the account to process Backpage transactions.

5 **Overt Act 9**

6 After Stripe notified Defendant Ferrer that it was closing the account, Defendant Ferrer
7 directed Kopecky to tell Stripe that Postfaster LLC had no connection to Backpage and
8 was a site that hosted ads for truck drivers and other jobs.

9 **Overt Act 10**

10 In early 2015, Defendant Ferrer received notice from American Express that the company
11 would not process Backpage transactions after **May 1, 2015**. Defendant Ferrer directed
12 Backpage personnel to “bury” a message notifying users that American Express would not
13 be accepted, but to process any American Express payments that Backpage users attempted.

14 **Overt Act 11**

15 Defendant Ferrer also directed Backpage personnel to contact American Express users and
16 guide them through a process to use American Express to purchase “credits” on
17 Postfastr.com which could then be used on Backpage.com.

18 **Overt Act 12**

19 In May of 2015, Defendants conducted \$48,288.85 in American Express transactions from
20 Backpage’s female Escort section throughout California, including Sacramento County.

21 **Overt Act 13**

22 In May of 2015, Defendants conducted \$7,904.00 in credits purchased via American
23 Express on Postfastr.com.

24 **Overt Act 14**

25 In June of 2015, Defendants conducted \$31,786.25 in American Express transactions from
26 Backpage’s female Escort section throughout California, including Sacramento County.

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Overt Act 15

In June of 2015, Defendants conducted \$16,152.32 in credits purchased via American Express on Postfastr.com.

Overt Act 16

In July of 2015, defendants conducted \$11,105.78 in American Express transactions from Backpage's female Escort section users throughout California, including Sacramento county.

Overt Act 17

From July 1 through 7, 2015, Defendants conducted \$8,771.90 in credits purchased via American Express on Postfastr.com.

Overt Act 18

Defendant Ferrer directed Backpage personnel to alter billing descriptors on Backpage.com transactions to eliminate references to Backpage.

Overt Act 19

Between August 1, 2013 and October 31, 2016, Defendants received approximately \$45,202,288.49 from transactions initially purchased through Backpage.com's Escort categories throughout California, including Sacramento County.

COUNT TWO

(Penal Code section 186.10(a)(2), MONEY LAUNDERING)

On or about and between July 1, 2014 and July 31, 2014, throughout California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit: \$1,082,934.67; knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

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1 **COUNT THREE**

2 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

3 On or about and between August 1, 2014 and August 31, 2014, throughout California,
4 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
5 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
6 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
7 \$2,063,128.70; knowing that such monetary instrument or instruments represent the proceeds of,
8 or is derived directly or indirectly from the proceeds of criminal activity.

9 **COUNT FOUR**

10 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

11 On or about and between September 1, 2014 and September 30, 2014, throughout
12 California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of
13 Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and
14 unlawfully conduct transactions involving monetary instruments of a total value exceeding
15 \$25,000, to wit: \$2,086,152.04; knowing that such monetary instrument or instruments represent
16 the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

17 **COUNT FIVE**

18 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

19 On or about and between October 1, 2014 and October 31, 2014, throughout California,
20 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
21 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
22 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
23 \$2,212,972.21; knowing that such monetary instrument or instruments represent the proceeds of,
24 or is derived directly or indirectly from the proceeds of criminal activity.

25 **COUNT SIX**

26 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

27 On or about and between November 1, 2014 and November 30, 2014, throughout
28 California, including Sacramento County, the crime of money MONEY LAUNDERING, in

1 violation of Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did
2 willfully and unlawfully conduct transactions involving monetary instruments of a total value
3 exceeding \$25,000, to wit: \$2,148,391.52; knowing that such monetary instrument or instruments
4 represent the proceeds of, or is derived directly or indirectly from the proceeds of criminal
5 activity.

6 **COUNT SEVEN**

7 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

8 On or about and between December 1, 2014 and December 31, 2014, throughout
9 California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of
10 Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and
11 unlawfully conduct transactions involving monetary instruments of a total value exceeding
12 \$25,000, to wit: \$2,252,053.16; knowing that such monetary instrument or instruments represent
13 the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

14 **COUNT EIGHT**

15 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

16 On or about and between January 1, 2015 and January 31, 2015, throughout California,
17 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
18 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
19 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
20 \$2,338,789.97; knowing that such monetary instrument or instruments represent the proceeds of,
21 or is derived directly or indirectly from the proceeds of criminal activity.

22 **COUNT NINE**

23 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

24 On or about and between February 1, 2015 and February 28, 2015, throughout California,
25 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
26 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
27 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
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1 \$2,185,513.27; knowing that such monetary instrument or instruments represent the proceeds of,
2 or is derived directly or indirectly from the proceeds of criminal activity.

3 **COUNT TEN**

4 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

5 On or about and between March 1, 2015 and March 31, 2015, throughout California,
6 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
7 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
8 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
9 \$2,556,274.11; knowing that such monetary instrument or instruments represent the proceeds of,
10 or is derived directly or indirectly from the proceeds of criminal activity.

11 **COUNT ELEVEN**

12 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

13 On or about and between April 1, 2015 and April 30, 2015, throughout California,
14 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
15 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
16 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
17 \$2,620,805.68; knowing that such monetary instrument or instruments represent the proceeds of,
18 or is derived directly or indirectly from the proceeds of criminal activity.

19 **COUNT TWELVE**

20 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

21 On or about and between May 1, 2015 and May 31, 2015, throughout California, including
22 Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code section
23 186.10(a)(2), a felony, was committed by **Defendants LARKIN AND FERRER**, who did
24 willfully and unlawfully conduct transactions involving monetary instruments of a total value
25 exceeding \$25,000, to wit: \$48,288.85; knowing that such monetary instrument or instruments
26 represent the proceeds of, or is derived directly or indirectly from the proceeds of criminal
27 activity.

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COUNT THIRTEEN

(Penal Code section 186.10(a)(2), MONEY LAUNDERING)

On or about and between June 1, 2015 and June 30, 2015, throughout California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a felony, was committed by **Defendants LARKIN AND FERRER**, who did willfully and unlawfully conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit: \$31,786.25; knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

COUNT FOURTEEN

(Penal Code section 186.10(a)(2), MONEY LAUNDERING)

On or about and between July 1, 2015 and July 30, 2015, throughout California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit: \$598,695.98; knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

COUNT FIFTEEN

(Penal Code section 186.10(a)(2), MONEY LAUNDERING)

On or about and between August 1, 2015 and August 31, 2015, throughout California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit: \$383,801.33; knowing that such monetary instrument or instruments represent the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

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1 **COUNT SIXTEEN**

2 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

3 On or about and between September 1, 2015 and September 30 2015, throughout
4 California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of
5 Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and
6 unlawfully conduct transactions involving monetary instruments of a total value exceeding
7 \$25,000, to wit: \$347,802.26; knowing that such monetary instrument or instruments represent
8 the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

9 **COUNT SEVENTEEN**

10 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

11 On or about and between October 1, 2015 and October 31, 2015, throughout California,
12 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
13 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
14 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
15 \$711,060.93; knowing that such monetary instrument or instruments represent the proceeds of, or
16 is derived directly or indirectly from the proceeds of criminal activity.

17 **COUNT EIGHTEEN**

18 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

19 On or about and between November 1, 2015 and November 30, 2015, throughout
20 California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of
21 Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and
22 unlawfully conduct transactions involving monetary instruments of a total value exceeding
23 \$25,000, to wit: \$790,762.69; knowing that such monetary instrument or instruments represent
24 the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

25 **COUNT NINETEEN**

26 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

27 On or about and between December 1, 2015 and December 31, 2015, throughout
28 California, including Sacramento County, the crime of MONEY LAUNDERING, in violation of

1 Penal Code section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and
2 unlawfully conduct transactions involving monetary instruments of a total value exceeding
3 \$25,000, to wit: \$1,169,547.13; knowing that such monetary instrument or instruments represent
4 the proceeds of, or is derived directly or indirectly from the proceeds of criminal activity.

5 **COUNT TWENTY**

6 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

7 On or about and between January 1, 2016 and January 31, 2016, throughout California,
8 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
9 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
10 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
11 \$1,273,683.55; knowing that such monetary instrument or instruments represent the proceeds of,
12 or is derived directly or indirectly from the proceeds of criminal activity.

13 **COUNT TWENTY ONE**

14 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

15 On or about and between February 1, 2016 and February 28, 2016, throughout California,
16 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
17 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
18 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
19 \$1,203,777.10; knowing that such monetary instrument or instruments represent the proceeds of,
20 or is derived directly or indirectly from the proceeds of criminal activity.

21 **COUNT TWENTY TWO**

22 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

23 On or about and between March 1, 2016 and March 31, 2016, throughout California,
24 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
25 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
26 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
27 \$1,283,050.72; knowing that such monetary instrument or instruments represent the proceeds of,
28 or is derived directly or indirectly from the proceeds of criminal activity.

1 **COUNT TWENTY THREE**

2 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

3 On or about and between April 1, 2016 and April 30, 2016, throughout California,
4 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
5 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
6 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
7 \$1,387,266.85; knowing that such monetary instrument or instruments represent the proceeds of,
8 or is derived directly or indirectly from the proceeds of criminal activity.

9 **COUNT TWENTY FOUR**

10 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

11 On or about and between May 1, 2016 and May 31, 2016, throughout California, including
12 Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code section
13 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully conduct
14 transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
15 \$1,477,020.43; knowing that such monetary instrument or instruments represent the proceeds of,
16 or is derived directly or indirectly from the proceeds of criminal activity.

17 **COUNT TWENTY FIVE**

18 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

19 On or about and between June 1, 2016 and June 30, 2016, throughout California, including
20 Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code section
21 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully conduct
22 transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
23 \$1,469,458.14; knowing that such monetary instrument or instruments represent the proceeds of,
24 or is derived directly or indirectly from the proceeds of criminal activity.

25 **COUNT TWENTY SIX**

26 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

27 On or about and between July 1, 2016 and July 31, 2016, throughout California, including
28 Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code section

1 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully conduct
2 transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
3 \$1,534,210.45; knowing that such monetary instrument or instruments represent the proceeds of,
4 or is derived directly or indirectly from the proceeds of criminal activity.

5 **COUNT TWENTY SEVEN**

6 **(Penal Code section 186.10(a)(2), MONEY LAUNDERING)**

7 On or about and between August 1, 2016 and August 31, 2016, throughout California,
8 including Sacramento County, the crime of MONEY LAUNDERING, in violation of Penal Code
9 section 186.10(a)(2), a felony, was committed by **Defendants**, who did willfully and unlawfully
10 conduct transactions involving monetary instruments of a total value exceeding \$25,000, to wit:
11 \$1,564,182.72; knowing that such monetary instrument or instruments represent the proceeds of,
12 or is derived directly or indirectly from the proceeds of criminal activity.

13 **COUNT TWENTY EIGHT**

14 **(Penal Code sections 182/266h, PIMPING CONSPIRACY)**

15 On or between January 1, 2010 and September 28, 2016, in the County of Sacramento and
16 throughout the State of California, **Defendants** did unlawfully commit the crime of
17 CONSPIRACY in violation of section 182(a)(1) of the Penal Code in that said Defendants did
18 unlawfully conspire together with each other and with others whose identities are known and
19 unknown, to commit the crime of pimping, in violation of section 266h of the Penal Code, a
20 felony; and that pursuant to and for the purposes of carrying out the objectives of the aforesaid
21 conspiracy, the said Defendants committed the following overt acts, throughout the alleged time
22 period:

23 **Overt Act 1**

24 On or about September 10, 2014, Defendants received prostitution earnings from A.C., a
25 minor, in Sacramento County.

26 **Overt Act 2**

27 On or about August 19, 2014, Defendants received prostitution earnings from E.V., a
28 minor, in Los Angeles County.

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Overt Act 3

On or about February 8, 2015, Defendants received prostitution earnings from L.F., a minor, in Santa Clara County.

Overt Act 4

On or about February 1, 2015, Defendants received prostitution earnings from Z.G., a minor, in Los Angeles County.

Overt Act 5

On or about October 7, 2012, Defendants received prostitution earnings from A.H. in Sacramento County.

Overt Act 6

On or about July 30, 2014, Defendants received prostitution earnings from S.C. in Sacramento County.

Overt Act 7

On or about August 19, 2014, Defendants received prostitution earnings from L.B. in Los Angeles County.

Overt Act 8

On or about April 4, 2015, Defendants received prostitution earnings from K.A. in Sacramento County.

Overt Act 9

On or about November 6, 2015, Defendants received prostitution earnings from C.U., a minor, in Sacramento County.

Overt Act 10

On or about August 12, 2016, Defendants received prostitution earnings from A.B., a minor, in Fresno County.

Overt Act 11

On or about November 22, 2015, Defendants received prostitution earnings from A.F. in Sacramento County.

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1 **Overt Act 12**

2 Between December 6, 2015 to December 28, 2015, Defendants received prostitution
3 earnings from S.D., a minor, in Santa Clara County.

4 **Overt Act 13**

5 Defendants owned and operated multiple websites, including Backpage.com.

6 **Overt Act 14**

7 Defendants used Backpage.com to collect the earnings of prostitutes and their pimps.

8 **Overt Act 15**

9 Defendants designed and used other websites to increase web traffic to Backpage.com and
10 thereby increase its own revenue from the illegal sex trade.

11 **Overt Act 16**

12 Defendants designed two of their websites, BigCity and EvilEmpire, using content
13 developed by Defendants and their employees with the purpose of promoting Backpage's
14 prostitution business and monopolizing the market.

15 **Overt Act 17**

16 Defendants created profiles for thousands of victims, including minors, on BigCity and
17 EvilEmpire.

18 **Overt Act 18**

19 Defendants created profiles for the victims named in counts 29, 30, 31, 32, 35, 36, 37-40
20 without their knowledge.

21 **Overt Act 19**

22 Victims could not remove or edit the pictures or information the defendant's placed on
23 EvilEmpire and when one victim contacted Backpage, staff replied that Backpage was not
24 affiliated with EvilEmpire and could not remove her picture.

25 **Overt Act 20**

26 Defendants created other websites that were unrelated to prostitution. Defendants used
27 these websites to process prostitution-related transactions when financial institutions were
28 unwilling to conduct business with Defendants.

1 **COUNT TWENTY NINE**

2 **(Penal Code section 266h(b)(2), PIMPING A MINOR UNDER 16 YEARS OF AGE)**

3 For a further and separate cause of action, being a different offense from, but connected in
4 its commission with, the charge set forth above, on or about and between September 1, 2014
5 through December 31, 2014, in the County of Sacramento, **Defendant FERRER** did unlawfully
6 commit the crime of PIMPING OF A MINOR, in violation of Penal Code section 266h(b)(2), in
7 that said Defendant, knowing A.C., a minor under 16 years of age, to engage in prostitution, did
8 live and derive support and maintenance in whole or in part from the earnings and proceeds of
9 said prostitution.

10 **COUNT THIRTY**

11 **(Penal Code section 266h(b)(2), PIMPING A MINOR UNDER 16 YEARS OF AGE)**

12 For a further and separate cause of action, being a different offense from, but connected in
13 its commission with, the charge set forth above, on or about and between August 1, 2014 through
14 January 1, 2015, in the County of Los Angeles, **Defendant FERRER** did unlawfully commit the
15 crime of PIMPING OF A MINOR in violation of Penal Code section 266h(b)(2), in that said
16 Defendant, knowing E.V., a minor under 16, to be a prostitute, did live and derive support and
17 maintenance in whole or in part from the earnings and proceeds of said prostitution.

18 **COUNT THIRTY ONE**

19 **(Penal Code section 266h(b)(2), PIMPING A MINOR UNDER 16 YEARS OF AGE)**

20 For a further and separate cause of action, being a different offense from, but connected in
21 its commission with, the charge set forth above, on or about and between January 1, 2015 through
22 February 28, 2015, in the County of Santa Clara, **Defendant FERRER** did unlawfully commit
23 the crime of PIMPING OF A MINOR in violation of Penal Code section 266h(b)(2), in that said
24 Defendant, knowing L.F., a minor under 16 years, to engage in prostitution, did live and derive
25 support and maintenance in whole or in part from the earnings and proceeds of said prostitution.

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1 **COUNT THIRTY TWO**

2 **(Penal Code section 266h(b)(1), PIMPING A MINOR)**

3 For a further and separate cause of action, being a different offense from, but connected in
4 its commission with, the charge set forth above, on or about and between June 1, 2015 through
5 September 30, 2015, in the County of Los Angeles, **Defendant FERRER** did unlawfully commit
6 the crime of PIMPING OF A MINOR in violation of Penal Code section 266h(b)(1), in that said
7 Defendant, knowing Z.G., a minor, to engage in prostitution, did live and derive support and
8 maintenance in whole or in part from the earnings and proceeds of said prostitution.

9 **COUNT THIRTY THREE**

10 **(Penal Code section 266h(a), PIMPING)**

11 For a further and separate cause of action, being a different offense from, but connected in
12 its commission with, the charge set forth above, on or about and between April 28, 2014 through
13 March 6, 2015, in the County of Sacramento, **Defendant FERRER** did unlawfully commit the
14 crime of PIMPING in violation of Penal Code section 266h(a), in that said Defendant, knowing
15 A.H. to be a prostitute, did live and derive support and maintenance in whole or in part from the
16 earnings and proceeds of said prostitution.

17 **COUNT THIRTY FOUR**

18 **(Penal Code section 266h(a), PIMPING)**

19 For a further and separate cause of action, being a different offense from, but connected in
20 its commission with, the charge set forth above, on or about and between July 1, 2014 through
21 August 31, 2015, in the County of Sacramento, **Defendant FERRER** did unlawfully commit the
22 crime of PIMPING in violation of Penal Code section 266h(a), in that said Defendant, knowing
23 S.C. to be a prostitute, did live and derive support and maintenance in whole or in part from the
24 earnings and proceeds of said prostitution.

25 **COUNT THIRTY FIVE**

26 **(Penal Code section 266h(a), PIMPING)**

27 For a further and separate cause of action, being a different offense from, but connected in
28 its commission with, the charge set forth above, on or about and between August 1, 2014 and

1 August 31, 2014, in the County of Los Angeles, **Defendant FERRER** did unlawfully commit the
2 crime of PIMPING in violation of Penal Code section 266h(a), in that said Defendant, knowing
3 L.B. to be a prostitute, did live and derive support and maintenance in whole or in part from the
4 earnings and proceeds of said prostitution.

5 **COUNT THIRTY SIX**

6 **(Penal Code section 266h(a), PIMPING)**

7 For a further and separate cause of action, being a different offense from, but connected in
8 its commission with, the charge set forth above, on or about and between January 1, 2016 to June
9 1, 2016 in the County of Sacramento, **Defendant FERRER** did unlawfully commit the crime of
10 PIMPING in violation of Penal Code section 266h(a), in that said Defendant, knowing K.A. to be
11 a prostitute, did live and derive support and maintenance in whole or in part from the earnings
12 and proceeds of said prostitution.

13 **COUNT THIRTY SEVEN**

14 **(Penal Code section 266h(b)(1), PIMPING A MINOR 16 YEARS OF AGE)**

15 For a further and separate cause of action, being a different offense from, but connected in
16 its commission with, the charge set forth above, on or about and between November 1, 2014
17 through November 6, 2015, in the County of Sacramento, **Defendant FERRER** did unlawfully
18 commit the crime of PIMPING OF A MINOR in violation of Penal Code section 266h(b)(1), in
19 that said Defendant, knowing C.U., a minor over 16 years, to engage in prostitution, did live and
20 derive support and maintenance in whole or in part from the earnings and proceeds of said
21 prostitution.

22 **COUNT THIRTY EIGHT**

23 **(Penal Code section 266h(b)(1), PIMPING A MINOR 16 YEARS OF AGE)**

24 For a further and separate cause of action, being a different offense from, but connected in
25 its commission with, the charge set forth above, on or about August 12, 2016 in the County of
26 Fresno, **Defendant FERRER** did unlawfully commit the crime of PIMPING OF A MINOR in
27 violation of Penal Code section 266h(b)(1), in that said Defendant, knowing A.B., a minor over
28

1 16 years, to engage in prostitution, did live and derive support and maintenance in whole or in
2 part from the earnings and proceeds of said prostitution.

3 **COUNT THIRTY NINE**

4 **(Penal Code section 266h(a), PIMPING)**

5 For a further and separate cause of action, being a different offense from, but connected in
6 its commission with, the charge set forth above, on or about and between November 22, 2015 and
7 December 5, 2015, in the County of Sacramento, **Defendant FERRER** did unlawfully commit
8 the crime of PIMPING in violation of Penal Code section 266h(a), in that said Defendant,
9 knowing A.F. to be a prostitute, did live and derive support and maintenance in whole or in part
10 from the earnings and proceeds of said prostitution.

11 **COUNT FORTY**

12 **(Penal Code section 266h(b)(2), PIMPING A MINOR UNDER 16 YEARS OF AGE)**

13 For a further and separate cause of action, being a different offense from, but connected in
14 its commission with, the charge set forth above, on or about and between December 6, 2015 to
15 December 28, 2015 in the County of Santa Clara, **Defendant FERRER** did unlawfully commit
16 the crime of PIMPING OF A MINOR in violation of Penal Code section 266h(b)(2), in that said
17 Defendant, knowing S.D., a minor under 16 years, to engage in prostitution, did live and derive
18 support and maintenance in whole or in part from the earnings and proceeds of said prostitution.

19 **PENAL CODE SECTION 186.10 ENHANCEMENT ALLEGATION**

20 Pursuant to Penal Code section 186.10(c)(1)(B), it is further alleged as to counts 14-18 that
21 the value of the individually alleged transactions exceeds one hundred fifty thousand dollars
22 (\$150,000) but is less than one million dollars (\$1,000,000), so that the court, in addition to and
23 consecutive to the felony punishment otherwise imposed pursuant to this section, shall impose an
24 additional term of imprisonment of two years.

25 **PENAL CODE SECTION 186.10 ENHANCEMENT ALLEGATION**

26 Pursuant to Penal Code section 186.10(c)(1)(C), it is further alleged as to counts 2-9, 19-26,
27 that the value of the individually alleged transactions exceeds one million dollars (\$1,000,000),
28 but is less than two million five hundred thousand dollars (\$2,500,000), so that the court, in

1 addition to and consecutive to the felony punishment otherwise imposed pursuant to this section,
2 shall impose an additional term of imprisonment of three years.

3 **PENAL CODE SECTION 186.10 ENHANCEMENT ALLEGATION**

4 Pursuant to Penal Code section 186.10(c)(1)(D), it is further alleged as to counts 10-11, that
5 the value of the individually alleged transactions exceeds two million five hundred thousand
6 dollars (\$2,500,000), so that the court, in addition to and consecutive to the felony punishment
7 otherwise prescribed by this section, shall impose an additional term of imprisonment of four
8 years.

9 **NOTICE:** Conviction of the offenses charged in counts 28-32, 37-38, 40 will require you
10 to register pursuant to Penal Code section 290. Willful failure to register is a crime.

11 **NOTICE:** Per Penal Code sections 11166 and 11168, a Suspected Child Abuse Report
12 (SCAR) may have been generated in counts 28-32, 37-38, 40. Penal Code sections 11167 and
13 11167.5 limit access to a SCAR. A court-issued protective order is needed to obtain a copy of the
14 report.

15 **NOTICE:** Penal Code section 1203.065(a) prohibits a grant of probation for the offenses
16 charged in counts 28-40.

17 **NOTICE:** Per Penal Code section 1054.5(b), the People hereby informally request that
18 defense counsel provide the People with discovery as required by Penal Code section 1054.3.


19 **DECLARATION**

20 I declare under penalty of perjury, under Penal Code section 806, that the foregoing is true
21 and correct.

22 Dated: December 23, 2016

Respectfully Submitted,

23 KAMALA D. HARRIS
Attorney General of California

24 

25 MAGGY KRELL
26 Supervising Deputy Attorney General
Attorneys for the People

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28 32562042