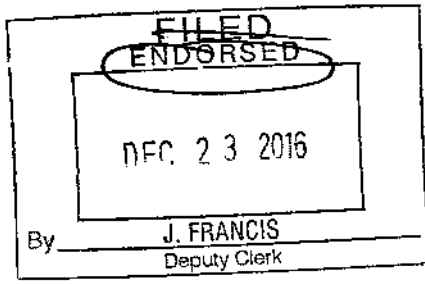


1 KAMALA D. HARRIS  
Attorney General of California  
2 ROBERT MORGESTER  
Senior Assistant Attorney General  
3 RANDY MAILMAN  
Deputy Attorney General  
4 MAGGY KRELL  
Supervising Deputy Attorney General  
5 State Bar No. 226675  
6 1300 I Street, Suite 125  
P.O. Box 944255  
7 Sacramento, CA 94244-2550  
Telephone: (916) 327-1995  
8 Fax: (916) 322-2368  
9 *Attorneys for the People of the State of California*



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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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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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*

27 SA2013311583  
28 32562042