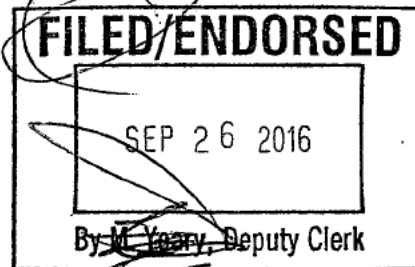


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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
11 IN AND FOR THE COUNTY OF SACRAMENTO  
12

13 **PEOPLE OF THE STATE OF**  
14 **CALIFORNIA,**

Case No.

Plaintiff,

15 v.

- 16
- 17 **1. CARL FERRER**  
(DOB: [REDACTED]) (Xref # *5094010* )
- 18 **2. MICHAEL LACEY**  
(DOB: [REDACTED]) (Xref # *5094013* )
- 19 **3. JAMES LARKIN**  
(DOB: [REDACTED]) (Xref # *5094012* )
- 20

**CRIMINAL COMPLAINT**

21  
22 Defendants.

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

25 **COUNT ONE**  
26 **(Penal Code sections 182/266h, PIMPING CONSPIRACY)**

27 On or between January 1, 2010 and September 26, 2016, in the County of Sacramento and  
28 throughout the state of California, Defendants FERRER, LACEY, and LARKIN did unlawfully

1 commit the crime of CONSPIRACY in violation of section 182(a)(1) of the Penal Code in that  
2 said Defendants did unlawfully conspire together with each other and with others whose identities  
3 are known and unknown, to commit the crime of pimping, in violation of section 266h of the  
4 Penal Code, a felony; and that pursuant to and for the purposes of carrying out the objectives of  
5 the aforesaid conspiracy, the said Defendants committed the following overt acts, throughout the  
6 alleged time period:

7 **Overt Act 1**

8 On or between January 1, 2010 and September 26, 2016, Defendants LARKIN and  
9 LACEY owned a website at www.Backpage.com, which provided online classified ad services.

10 **Overt Act 2**

11 On or between January 1, 2010 and September 26, 2016 Defendants LARKIN, LACEY,  
12 and FERRER operated Backpage.com.

13 **Overt Act 3**

14 On or between January 1, 2010 and May 2015, Defendants LARKIN, LACEY, and  
15 FERRER required users of Backpage.com to pay to post escort advertisements in the adult  
16 services section, unlike any other section of the website.

17 **Overt Act 4**

18 Defendant FERRER developed and oversaw a process to screen escort ads on  
19 Backpage.com.

20 **Overt Act 5**

21 Defendant FERRER directed the creation of two additional websites, EvilEmpire.com and  
22 BigCity.com.

23 **Overt Act 6**

24 Defendant FERRER used content from escort advertisements on Backpage.com to create  
25 advertisements on EvilEmpire.com and BigCity.com.

26 **Overt Act 7**

27 On or about late 2013, Defendant FERRER arranged for credit card transactions to be  
28 processed by Jetpay because financial institutions were blocking transactions with Backpage.com.

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**Overt Act 8**

Between October 2014 and May 2015, Backpage accepted at least \$2,000,000.00 per month in payments from people posting adult section advertisements in California.

**Overt Act 9**

On or about September 10, 2014, Backpage.com received a credit card payment in the amount of \$20.60 for posting an escort advertisement in Sacramento County featuring minor A.C.

**Overt Act 10**

On or about August 19, 2014, Backpage.com received a credit card payment in the amount of \$12.00 for posting an escort advertisement in Los Angeles County featuring minor E.V.

**Overt Act 11**

On or about February 8, 2015, Backpage.com received a credit card payment in the amount of \$10.00 for posting an escort advertisement in Santa Clara County featuring minor L.F.

**Overt Act 12**

On or about July 25, 2015, Backpage.com posted an escort advertisement in Sacramento County featuring minor E.S.

**Overt Act 13**

On or about February 1, 2015, Backpage.com received a payment in the amount of \$10.00 for posting an escort advertisement in Los Angeles County featuring minor Z.G.

**Overt Act 14**

On or about October 7, 2012, Backpage.com received a credit card payment in the amount of \$7.00 for posting an escort advertisement in Sacramento County featuring A.H.

**Overt Act 15**

On or about July 30, 2014, Backpage.com received a payment in the amount of \$5.00 for posting an escort advertisement in Sacramento County featuring S.C.

1 **Overt Act 16**

2 On or about August 19, 2014, Backpage.com received a credit card payment in the amount  
3 of \$12.00 for posting an escort advertisement in Los Angeles County featuring L.B.

4 **Overt Act 17**

5 On or about April 4, 2015, Backpage.com received a credit card payment in the amount of  
6 \$3.00 for posting an escort advertisement in Sacramento County featuring K.A.

7 **COUNT TWO**

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

9 For a further and separate cause of action, being a different offense from, but connected in  
10 its commission with, the charge set forth above, on or about and between September 1, 2014  
11 through December 31, 2014, in the County of Sacramento, Defendant FERRER did unlawfully  
12 commit the crime of pimping of a minor, in violation of Penal Code section 266h(b), in that said  
13 Defendant, knowing A.C. a minor under 16 years of age, to engage in prostitution, did live and  
14 derive support and maintenance in whole or in part from the earnings and proceeds of said  
15 prostitution or from money loaned to or advanced to and charged against said prostitute by a  
16 keeper manager and inmate of a house and other place where prostitution was practiced or  
17 allowed or did unlawfully, knowing A.C., a minor under 16 years of age, to engage in  
18 prostitution, solicit and receive compensation for soliciting for said prostitute.

19 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
20 section 290. Willful failure to register is a crime.

21 NOTICE: Pursuant to Penal Code sections 11166 and 11168, a Suspected Child Abuse  
22 Report (SCAR) may have been generated in this case. Penal Code sections 11167 and 11167.5  
23 limit access to a SCAR. A court-issued protective order is necessary to obtain a copy of the  
24 report.

25 **COUNT THREE**

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

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 through

1 January 1, 2015, 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 E.V., 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 or from money loaned to or advanced to and charged  
5 against said prostitute by a keeper manager and inmate of a house and other place where  
6 prostitution was practiced or allowed, or did unlawfully, knowing E.V., to be a prostitute, solicit  
7 and receive compensation for soliciting for said prostitute.

8 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
9 section 290. Willful failure to register is a crime.

10 NOTICE: Pursuant to Penal Code sections 11166 and 11168, a Suspected Child Abuse  
11 Report (SCAR) may have been generated in this case. Penal Code sections 11167 and 11167.5  
12 limit access to a SCAR. A court-issued protective order is necessary to obtain a copy of the  
13 report.

#### 14 **COUNT FOUR**

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

16 For a further and separate cause of action, being a different offense from, but connected in  
17 its commission with, the charge set forth above, on or about and between January 1, 2015 through  
18 February 28, 2015, in the County of Santa Clara, Defendant FERRER did unlawfully commit the  
19 crime of pimping of a minor, in violation of Penal Code section 266h(b), in that said Defendant,  
20 knowing L.F., a minor under 16 years, to engage in prostitution, did live and derive support and  
21 maintenance in whole or in part from the earnings and proceeds of said prostitution or from  
22 money loaned to or advanced to and charged against said prostitute by a keeper manager and  
23 inmate of a house and other place where prostitution was practiced or allowed, or did unlawfully,  
24 knowing L.F., a minor under 16 years of age, to engage in prostitution, solicit and receive  
25 compensation for soliciting for said prostitute.

26 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
27 section 290. Willful failure to register is a crime.  
28

1 NOTICE: Pursuant to Penal Code sections 11166 and 11168, a Suspected Child Abuse  
2 Report (SCAR) may have been generated in this case. Penal Code sections 11167 and 11167.5  
3 limit access to a SCAR. A court-issued protective order is necessary to obtain a copy of the  
4 report.

5 **COUNT FIVE**  
6 **(Penal Code sections 266h(b)(2)/664), ATTEMPTED PIMPING OF A MINOR UNDER 16)**

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 July 1, 2015 through  
9 August 31, 2015, in the County of Sacramento, Defendant FERRER did unlawfully commit the  
10 crime of attempted pimping of a minor, in violation of Penal Code sections 266h(a)/664, in that  
11 said Defendant, knowing E.S., a minor under 16 years of age, to engage in prostitution, did live  
12 and derive support and maintenance in whole or in part from the earnings and proceeds of said  
13 prostitution or from money loaned to or advanced to and charged against said prostitute by a  
14 keeper manager and inmate of a house and other place where prostitution was practiced or  
15 allowed, or did unlawfully, knowing E.S., a minor under 16 years of age, to engage in  
16 prostitution, solicit and receive compensation for soliciting for said prostitute.

17 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
18 section 290. Willful failure to register is a crime.

19 NOTICE: Pursuant to Penal Code sections 11166 and 11168, a Suspected Child Abuse  
20 Report (SCAR) may have been generated in this case. Penal Code sections 11167 and 11167.5  
21 limit access to a SCAR. A court-issued protective order is necessary to obtain a copy of the  
22 report.

23 **COUNT SIX**  
24 **(Penal Code section 266h(b)(2), PIMPING A MINOR)**

25 For a further and separate cause of action, being a different offense from, but connected in  
26 its commission with, the charge set forth above, on or about and between June 1, 2015 through  
27 September 30, 2015, in the County of Los Angeles, Defendant FERRER did unlawfully commit  
28 the crime of pimping of a minor, in violation of Penal Code section 266h(b), in that said

1 Defendant, knowing Z.G., a minor, to engage in prostitution, did live and derive support and  
2 maintenance in whole or in part from the earnings and proceeds of said prostitution or from  
3 money loaned to or advanced to and charged against said prostitute by a keeper manager and  
4 inmate of a house and other place where prostitution was practiced or allowed, or did unlawfully,  
5 knowing Z.G., a minor, to engage in prostitution, solicit and receive compensation for soliciting  
6 for said prostitute.

7 NOTICE: Conviction of this offense will require you to register pursuant to Penal Code  
8 section 290. Willful failure to register is a crime.

9 NOTICE: Pursuant to Penal Code sections 11166 and 11168, a Suspected Child Abuse  
10 Report (SCAR) may have been generated in this case. Penal Code sections 11167 and 11167.5  
11 limit access to a SCAR. A court-issued protective order is necessary to obtain a copy of the  
12 report.

13 **COUNT SEVEN**  
14 **(Penal Code section 266h(a), PIMPING)**

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 April 28, 2014 through  
17 March 6, 2015, in the County of Sacramento, Defendant FERRER did unlawfully commit the  
18 crime of pimping, in violation of Penal Code section 266h(a), in that said Defendant, knowing  
19 A.H., to be a prostitute, did live and derive support and maintenance in whole or in part from the  
20 earnings and proceeds of said prostitution or from money loaned to or advanced to and charged  
21 against said prostitute by a keeper manager and inmate of a house and other place where  
22 prostitution was practiced or allowed, or did unlawfully, knowing A.H., to be a prostitute, solicit  
23 and receive compensation for soliciting for said prostitute.

24 **COUNT EIGHT**  
25 **(Penal Code section 266h(a), PIMPING)**

26 For a further and separate cause of action, being a different offense from, but connected in  
27 its commission with, the charge set forth above, on or about and between July 1, 2014 through  
28 August 31, 2015, in the County of Sacramento, Defendant FERRER did unlawfully commit the

1 crime of pimping, in violation of Penal Code section 266h(a), in that said Defendant, knowing  
2 S.C., to be a prostitute, did live and derive support and maintenance in whole or in part from the  
3 earnings and proceeds of said prostitution or from money loaned to or advanced to and charged  
4 against said prostitute by a keeper manager and inmate of a house and other place where  
5 prostitution was practiced or allowed, or did unlawfully, knowing S.C., to be a prostitute, solicit  
6 and receive compensation for soliciting for said prostitute.

7  
8 **COUNT NINE**  
**(Penal Code section 266h(a))**

9 For a further and separate cause of action, being a different offense from, but connected in  
10 its commission with, the charge set forth above, on or about and between August 1, 2014 and  
11 August 31, 2014, in the County of Los Angeles, Defendant FERRER did unlawfully commit the  
12 crime of pimping, in violation of Penal Code section 266h(a), in that said Defendant, knowing  
13 L.B. to be a prostitute, did live and derive support and maintenance in whole or in part from the  
14 earnings and proceeds of said prostitution or from money loaned to or advanced to and charged  
15 against said prostitute by a keeper manager and inmate of a house and other place where  
16 prostitution was practiced or allowed, or did unlawfully, knowing L.B. to be a prostitute, solicit  
17 and receive compensation for soliciting for said prostitute.

18  
19 **COUNT TEN**  
**(Penal Code section 266h(a))**

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, 2016 to June  
22 1, 2016 in the County of Sacramento, Defendant FERRER did unlawfully commit the crime of  
23 pimping, in violation of Penal Code section 266h(a), in that said Defendant, knowing K.A. to be a  
24 prostitute, did live and derive support and maintenance in whole or in part from the earnings and  
25 proceeds of said prostitution or from money loaned to or advanced to and charged against said  
26 prostitute by a keeper manager and inmate of a house and other place where prostitution was  
27 practiced or allowed, or did unlawfully, knowing K.A. to be a prostitute, solicit and receive  
28 compensation for soliciting for said prostitute.



1 NOTICE: Penal Code section 1203.065(a) prohibits a grant of probation for offenses  
2 charged in counts 2-10).

3 Pursuant to Penal Code section 1054.5(b), the People hereby informally request that  
4 defense counsel provide the People with discovery as required by Penal Code section 1054.3.

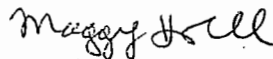
5 DECLARATION

6 Filed herewith and incorporated by reference is a declaration in support of arrest warrant. I  
7 declare under penalty of perjury, pursuant to Penal Code section 806, that the forgoing is true and  
8 correct.

9  
10 Dated: September 26, 2016

Respectfully Submitted,

11 KAMALA D. HARRIS  
12 Attorney General of California

13 

14  
15 MAGGY KRELL  
16 Supervising Deputy Attorney General  
*Attorneys for People*

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