

AFFIDAVIT FOR SEARCH WARRANT

THE STATE OF TEXAS § **DOCKET #**
COUNTY OF DALLAS § **COURT:**

The undersigned Affiant, being a Peace Officer under the laws of Texas and being duly sworn, on oath makes the following statements and accusations:

1. There is in Harris County, Texas, a suspected person identified as described as follows: **CARL FERRER, Date of Birth 03/16/1961**, white male, red hair, hazel eyes, height: 5 feet 09 inches, weight: 185 pounds, DL# .



2. Affiant asks to search said suspected party for the following items which are believed to be implements or instruments used in the commission of a crime, namely: Texas Penal Code 34.02 – Money Laundering and/or items constituting evidence of the crime of Texas Penal Code 34.02 – Money Laundering or constituting evidence tending to show that a particular person committed the criminal offense of Money Laundering:

a. All business and financial records pertaining or relating to BACKPAGE.COM, its parent companies or companies that have an invested interest in BACKPAGE.COM. All business and financial documents pertaining or related to BACKPAGE.COM shareholders, namely CARL FERRER, JIM LARKIN, and MICHAEL LACEY.

b. All identifying documents, images real or forged relating to BACKPAGE.COM, its parent companies, or companies that have an invested interest in BACKPAGE.COM, CARL FERRER, JIM LARKIN, and MICHAEL LACEY.

c. Cellular telephones and SIM not known to your Affiant at this time that are registered and or subscribed to CARL FERRER, and any other memory cards or equipment related to the cellular telephone, believed to be in the care custody or control of CARL FERRER, the suspected party.

d. All communication content, including email, subscriber information, text (SMS/MMS or app chats), notes, or voicemail including attachments, source destination addresses, and time and date information, and connection logs, images and any other records that constitute evidence and instrumentalities of Texas Penal Code 34.02 – Money Laundering based on violations of California Penal Code sections 647(b) – Prostitution, 266(h) – Pimping, 182-185 – Conspiracy.

e. All notes, correspondence, documentation pertaining to BACKPAGE.COM its parent companies or companies that have an invested interest in BACKPAGE.COM;

f. Records identifying articles of personal property tending to show the identity of person(s) in ownership, or person(s) exercising dominion and control of said premises, including rent receipts, telephone bills, utility bills, mail, photographs, keys, and locks.

g. Any and all computer hardware that consists of all equipment, which can collect, analyze, create, display, convert, store, conceal, or transmit electronic data. Hardware includes (but is not limited to), servers, any motherboards, any data-processing devices such as, but not limited to chips, memory, and self-contained “laptop” or “notebook” computers; internal and peripheral storage devices (such as fixed hard disk drives, external hard disk disks, optical storage devices (DVD/CD), and flash media storage devices).

h. Any cellular phone, smartphone, or any electronic storage or Internet-connected device capable of storing information sought by this search warrant, belonging to CARL FERRER, BACKPAGE.COM, its employees, its parent companies or companies that have an invested interest in BACKPAGE.COM.

i. Any and all computer software which consists of any digital information which can be executed by a computer and any of its related components to direct the way they work, including programs to run operating systems, applications (like word-processing, graphics, or spreadsheet programs), utilities, compilers, interpreters, and communication programs, including software used to test chips and software to direct laser equipment. Software can be stored in electronic, magnetic, optical, or other digital form.

j. Any and all computer-related documentation described as written, recorded, printed, or electronically stored material, which explains or illustrates how to configure or use computer hardware, software or other related items.

k. Any and all digital storage device passwords and other data security devices designed to restrict access to or hide computer software, documentation or data, consisting of hardware, software or other programming code. Data security hardware may include encryption devices, chips and circuit boards. Data security software or digital code may include programming code that creates “test” keys or “hot” keys, which perform certain preset security functions when touched. Data security software or code may also encrypt; compress, hide or “booby-trap” data to make it inaccessible or unusable, as well as reverse the process to restore it.

The terms “records,” “information,” and “property” includes all of the foregoing items of evidence in whatever form and by whatever means they may have been created or stored, including records, whether stored on paper, on magnetic media such as tape, cassette, disk, diskette or on memory storage devices such as optical disks, programmable instruments such as telephones, “electronic address books,” calculators, or any other storage media, or any other form of “writing.”

The term "computer", as used herein, is defined pursuant to Title 18, United States Code, Section 1030(e)(1), as "an electronic, magnetic, optical, electrochemical, or other high speed data processing device performing logical or storage functions, and includes any data storage facility or communications facility directly related to or operating in conjunction with such device."

Your Affiant knows that effective searches and seizures of evidence from computers commonly require law enforcement officers to seize most or all computer items (hardware, software, and instructions) and then have these items processed later by a qualified computer forensic examiner in a controlled laboratory environment. This is true because of the following:

Searching computer systems for criminal evidence is a highly technical process requiring specialized skill in a properly controlled environment. The vast array of computer hardware and software available requires even computer examiners to specialize in some systems and applications. It is difficult to predict before a search which examiner should analyze the system and its data. The search of a computer is an exacting scientific procedure which is designed to protect the integrity of the evidence and to recover even hidden, erased, compressed, password protected, and/or encrypted files. Since computer evidence is extremely vulnerable to tampering or destruction from both external sources or from destructive codes imbedded in the system in the form of a “booby trap,” the controlled environment of a forensic laboratory is essential to its complete and accurate analysis and retrieval.

In order to fully retrieve data from a computer system, the forensic analyst needs all magnetic storage devices, as well as the computer itself. In cases where computers are used, the evidence usually consists partly of graphic files and the monitor and printer are essential to show the nature and quality of the graphic images that the system could produce. In addition, the forensic analyst needs all the system software, encryption, encoding, archiving, unarchiving and security software (operating system, applications, and hardware drivers) which may have been used to retrieve, store, create, transmit, encrypt or encode the data. Your Affiant seeks the above noted items to facilitate

and affect a search with minimal intrusion and to lessen the likelihood of damage to non-pertinent files or equipment.

Many complex computer systems will not operate properly without their corresponding attached peripheral devices and hardware. Many files require accompanying software in order to properly read the file and criminal suspects commonly hide records of their criminal enterprise by copying those records over commercially manufactured software. Many sophisticated computer systems require special instructions available only through the user manuals, which accompany the system. Due to these circumstances, your Affiant requests permission to seize peripheral devices and hardware, manuals, software items along with any computer system encountered subject to the requested warrant.

It is further requested that members of the California Department of Justice and California Attorney General's Office be permitted to accompany Texas Attorney General's Office agents in the execution of this search warrant and that any evidence seized, be shared with California Attorney General's Office and any law enforcement personnel working at their direction.

3. Your Affiant has probable cause for said belief by reason of the following facts and circumstances:

Affiant, Sergeant Cora Gray, has been a certified and licensed Texas peace officer since 2001. Your Affiant holds an Advanced Peace Officer Certificate issued by the Texas Commission on Law Enforcement. Your Affiant is currently assigned to the Human Trafficking and Transnational/Organized Crime Section, Criminal Investigations Division at the Office of the Attorney General of Texas. Your Affiant's current duty assignment is focused on human trafficking investigations. Your Affiant has specialized training in the investigation of human trafficking offenses, and has previously participated in operations and investigations of human trafficking offenses with other federal, state, and local law enforcement investigators. In the past four years your Affiant has conducted hundreds of searches on BACKPAGE.COM following up tips and investigative leads as well as searching for missing and exploited children. Your Affiant has completed numerous investigative courses in the field of human trafficking investigations and has investigated numerous cases where individuals were trafficked through postings on BACKPAGE.COM.

In addition, Your Affiant has relied upon the investigation conducted by the California Office of the Attorney General (CA DOJ) and specifically the work of Special Agent Brian Fichtner. Fichtner has been a sworn peace officer for 25 years, and has conducted numerous complex investigations related to narcotics, and computer based crime over his 18 years with the CA DOJ. Fichtner has also had more than 100 hours of computer-related crime professional training.

Summary of Probable Cause:

BACKPAGE.COM is a Dutch-owned limited liability corporation (LLC), incorporated in Delaware with its principal place of business in Dallas, Texas. It operates a worldwide online classified ad site on which people can post or locate an adult escort advertisement. It is currently the single largest purveyor of Internet sex ads in the United States, and BACKPAGE.COM's profits from this line of business register in the millions yearly.

In 2013, the state of California began a criminal investigation into the founders of BACKPAGE.COM, MICHAEL LACEY and JAMES LARKIN, and the CEO of BACKPAGE.COM, CARL FERRER, for the offenses of Conspiracy, Pimping, Pimping a Minor, and Attempted Pimping of a Minor. The investigation included information obtained through undercover sting operations, interviews with people engaged in prostitution posting ads on BACKPAGE.COM, review of internal communications, documents, and emails of BACKPAGE.COM employees, including CARL FERRER, obtained via valid search warrants, review of documents provided by the National Center for Missing and Exploited Children (NCMEC), review of public financial documents and statements, law enforcement requests, and subpoenas to BACKPAGE.COM. In addition, agents of the Office of the Attorney General of Texas engaged in surveillance of the relevant locations and did additional research into the corporate structure, building ownership, and company specifics. The investigation revealed the following:

1. The adult escort ads posted on BACKPAGE.COM are advertisements for prostitution, the exchange of sexual acts for a fee. People engaged in prostitution pay BACKPAGE.COM to post advertisements soliciting potential buyers for their sexual services. People engaged in prostitution, who purchase ads on BACKPAGE.COM, regularly use a portion of the money they earn from the resulting prostitution transactions to pay to post additional advertisements on BACKPAGE.COM for the purpose of soliciting sex buyers. These people engaged in prostitution purchase the ads with cash, credit cards, debit cards, gift cards, and Bitcoin.
2. BACKPAGE.COM receives more than 90% of their revenues from the adult escort ad portion of their classified advertising. In California, that amounts to approximately \$50 million in revenues for the period between January 2013 to May 31, 2015, or between \$1.5 to \$2.5 million per month. BACKPAGE.COM applies a uniform set of content rules to the advertisements that it agrees to post in the adult escort section, and as a result, the advertisements listed are similar in form, content, and appearance. BACKPAGE.COM has applied the same general business model since 2004, and is known by people engaged in prostitution as the website that gives them widest access to the pool of prospective buyers.
3. BACKPAGE.COM's principal physical location is 2501 Oaklawn, Suite 700, Dallas, Texas, 75219. This information was obtained from BACKPAGE.COM's self-published "Law Enforcement Guide," is listed on the building directory for 2501 Oaklawn, and is also the address listed for the company with the Texas Secretary of State.

4. According to the Dallas County Appraisal District, CARL FERRER is the listed owner of the location at 2501 Oaklawn, Suite 700, Dallas, Texas, 75219.

5. CARL FERRER has been the CEO of BACKPAGE.COM since 2012, but has handled the day-to-day operations for the company for much longer. CARL FERRER has been told directly by law enforcement about prostitution on BACKPAGE.COM, and is regularly copied on the hundreds of law enforcement subpoenas and requests that BACKPAGE.COM receives each year related to prostitution and sex trafficking of both adults and minors on the website. FERRER's communications and emails obtained by search warrant, his interactions with law enforcement, and even the public statements of his high level executives, such as his General Counsel, reflect personal knowledge that BACKPAGE.COM derives support or maintenance from the earnings of people engaged in prostitution.

6. Texas Workforce Commission records show CARL FERRER receives his personal income from BACKPAGE.COM through two affiliated companies, Website Technologies and Amstel River Holdings, LLC, both of which list 2501 Oaklawn, Dallas, TX, 75219, as their addresses. CARL FERRER also has access to and works at the physical location of 2501 Oaklawn, Suite 700, Dallas, TX, 75219. BACKPAGE.COM and Website Technologies are owned by Dartmoor Holdings, LLC, and banking records indicate that FERRER is the owner of Dartmoor Holdings, LLC. In contrast, a corporate disclosure statement filed by CARL FERRER's counsel with the United States Court of Appeals in Case No. 16-5232 in the Washington D.C. Circuit states BACKPAGE.COM is a subsidiary of and owned by several other privately held companies to include Dartmoor Holdings, LLC and Amstel River Holdings, LLC.

7. Under California's Pimping statute "knowing another person is a prostitute," it is illegal to "live, derive support or maintenance from the earnings or proceeds of a person's prostitution," or to "solicit or receive compensation for soliciting for the person." Pimping is a felony punishable with between 3 and 8 years imprisonment. *California's Penal Code 266h – Pimping.*

8. Violation of California Penal Code 266h – Pimping qualifies as "criminal activity" under Texas Penal Code 34.01 – Money Laundering because it is an offense "punishable by confinement for more than one year under the laws of another state." *Texas Penal Code 34.01(1)(B) – Money Laundering.*

9. The credit cards, gift cards, debit cards, Bitcoin, and cash used to purchase ads for prostitution on BACKPAGE.COM all qualify as "funds" under Texas Penal Code 34.01(2) – Money Laundering because "funds includes: (A) coin or paper money of the United States or any other country that is designated as legal tender and that circulates and is customarily used and accepted as a medium of exchange in the country of issue; (B) United States silver certificates, United States Treasury notes, and Federal Reserve System notes; (C) an official foreign bank note that is customarily used and accepted as a medium of exchange in a foreign country and a foreign bank draft; and (D) currency or its equivalent, including an electronic fund, a personal check, a bank

check, a traveler's check, a money order, a bearer negotiable instrument, a bearer investment security, a bearer security, a certificate of stock in a form that allows title to pass on delivery, or a stored value card as defined by section 604.001 of the Business & Commerce Code.” *Texas Penal Code 34.01(2) – Money Laundering.*

10. The revenue that BACKPAGE.COM generates from its adult escort ads qualify as “proceeds” under Texas Penal Code 34.01(4) – Money Laundering because the money used to purchase BACKPAGE.COM adult advertisements, and provide support and maintenance for the company and its CEO, is money received in exchange for sexual acts or prostitution in violation of California’s Pimping statute. “Proceeds means funds acquired or derived directly or indirectly from, produced through, realized through, or used in the commission of: (A) an act; or (B) conduct that constitutes an offense under section 151.07032 of the Tax Code.” *Texas Penal Code 34.01(4) – Money Laundering.*

11. As CEO of BACKPAGE.COM, CARL FERRER has engaged in the offense of Money Laundering under the Texas Penal Code because FERRER through his role with BACKPAGE.COM “knowingly: (1) acquires or maintains an interest in, conceals, possesses, transfers or transports the proceeds of criminal activity; (2) conducts, supervises or facilitates a transaction involving the proceeds of criminal activity; (3) invests, expends, or receives, or offers to invest, expend or receive, the proceeds of criminal activity or funds that the person believes are the proceeds of criminal activity; or (4) finances or invests or intends to finance or invest funds that the person believes are intended to further the commission of criminal activity.” *Texas Penal Code 34.02(a)(1-4) – Money Laundering.*

12. Under Texas Penal Code 34.02 – Money Laundering, CARL FERRER is presumed to believe that the funds generated by adult advertisements are the proceeds of criminal activity, including “Pimping” under California law, because he has been repeatedly given that information by law enforcement. “A person is presumed to believe that funds are the proceeds of or are intended to further the commission of criminal activity if a peace officer or a person acting at the direction of a peace officer represents to the person that the funds are proceeds of or are intended to further the commission of criminal activity, as applicable, regardless of whether the peace officer or person acting at the peace officer’s direction discloses the person’s status as a peace officer or that the person is acting at the direction of a peace officer.” *Texas Penal Code 34.02(b) – Money Laundering.*

13. Under Texas Penal Code 34.02 – Money Laundering, the court can consider all \$50 million generated by BACKPAGE.COM’s adult escort section in the state of California when classifying this offense because it constitutes an ongoing business model and a continuing course of conduct. “If proceeds of criminal activity are related to one scheme or continuing course of conduct, whether from the same or several sources, the conduct may be considered as one offense and the value of the proceeds aggregated in determining the classification of the offense.” *Texas Penal Code 34.02(f) – Money Laundering.*

14. Under Texas Penal Code 34.02 (e) "An offense under this section is: "(1) a state jail felony if the value of the funds is \$2,500 or more but less than \$30,000; (2) a felony of the third degree if the value of the funds is \$30,000 or more but less than \$150,000; (3) a felony of the second degree if the value of the funds is \$150,000 or more but less than \$300,000; or (4) a felony of the first degree if the value of the funds is \$300,000 or more." *Texas Penal Code 34.02(e) – Money Laundering.*

15. Based on the foregoing, there is sufficient probable cause to believe that CARL FERRER, as the CEO of BACKPAGE.COM, committed the first degree felony offense of Money Laundering under Texas Penal Code Section 34.02 by knowingly: (1) acquiring or maintaining an interest in, concealing, possessing, transferring or transporting the proceeds of criminal activity; (2) conducting, supervising or facilitating a transaction involving the proceeds of criminal activity; (3) investing, expending, or receiving, or offering to invest, expend or receive, the proceeds of criminal activity or funds that the person believes are the proceeds of criminal activity; or (4) financing or investing or intending to finance or invest funds that the person believes are intended to further the commission of criminal activity. *Texas Penal Code 34.02(a)(1-4) – Money Laundering.* Specifically the proceeds of criminal activity, are generated from the continuous violations of California 266h – Pimping, a felony offense punishable by more than one year in the state of California.

16. Based on the foregoing, the training and experience of your Affiant, the continuous nature of the crime of money laundering and BACKPAGE.COM's long term commitment to its current business model, there is also sufficient probable cause to believe that evidence of the crime of money laundering will be located at the business premises of BACKPAGE.COM, at 2501 Oak Lawn, Suite 700, Dallas, TX 75219.

Supporting Documentation for Probable Cause:

In 2013, the California Department of Justice (CA DOJ) began investigating BACKPAGE.COM, and in 2016, they asked for the assistance of the Office of the Attorney General of Texas (TX OAG). This investigation was initially sparked by reports from law enforcement agencies, the National Center for Missing and Exploited Children (NCMEC), and news stories about children who were repeatedly exploited for commercial sex on BACKPAGE.COM. Since 2012, NCMEC has worked on more than 400 cases involving children sold for commercial sex on BACKPAGE.COM. During this same time period, NCMEC has reported 2,900 instances to California law enforcement where suspected child sex trafficking occurred via BACKPAGE.COM.

In public presentations and internal documents, BACKPAGE.COM has described itself as the second largest online classified advertising service in the country. JAMES LARKIN and MICHAEL LACEY are the founders of BACKPAGE.COM, and CARL FERRER is the CEO of

BACKPAGE.COM, as well as one of its controlling shareholders. While BACKPAGE.COM claims that the bulk of its advertisements are non-sex based, the investigation has revealed that BACKPAGE.COM obtains more than 90% of its revenues from its adult escort advertisements. Based on the personal observations of SA Brian Fichtner, a review of the website, previous training, experience, casework, and research of your Affiant, I have learned that BACKPAGE.COM's customers overwhelmingly use the site's fee-based adult escort section compared to the other non fee-based sections such as job listings, automotive sales, or rentals. BACKPAGE.COM earns revenue primarily by charging customers to place sexual ads in its "Adult" section. These ads openly advertise sexual, lewd acts for money and regularly involve individuals less than 18 years of age.

During the course of this investigation, several California search warrants were authorized resulting in the seizure of email correspondence between BACKPAGE.COM executives and employees. These emails have provided additional insight into the operation, finances, and illegal activities of BACKPAGE.COM. Agents of both the CA DOJ and the TX OAG, have conducted surveillance, undercover operations, and interviewed sex trafficking victims, who were advertised on BACKPAGE.COM.

Undercover Operations:

April-May 2014

To identify potential victims in this case, CA DOJ agents employed several different investigative methods. Special Agent Trevor Dewar was the initial investigator in this case and relayed the following:

In May 2014, CA DOJ agents conducted an undercover sting operation targeting individuals being advertised in the adult escort section of BACKPAGE.COM. The operation involved an undercover agent responding to escort advertisements listed on BACKPAGE.COM by calling the phone number listed in the ad. Throughout the duration of the operation, undercover agents arranged several "dates" with female "escorts." Each "date" resulted with the "escort" agreeing to meet the undercover agent in a hotel room. Once in the hotel room, and within a few minutes of arriving, each "escort" began negotiating sex acts for money with the undercover agent. Based on this behavior, there was no mistaking that the sole purpose of the escort ad posted on BACKPAGE.COM was to offer sex for money. Each "escort" was interviewed, but not arrested.

March 2015

On March 6, 2015, SA Brian Fichtner created two undercover advertisements on the website BACKPAGE.COM. One of the ads offered the service of adult companionship for money and the other listed a sofa for sale.

In order to post an ad on BACKPAGE.COM, one must first log onto the website. The first page displays eleven (11) headings/sections with numerous categories under each section. One of the

sections is titled “adult.” The following categories are listed under this section: escorts, body rubs, strippers & strip clubs, dom & fetish, ts (transsexual), male escorts, phone & websites, and adult jobs.

At the top of the page is a link labeled “Post Ad.” Fichtner clicked on this link, and it displayed a page that listed eleven (11) sections similar to the previous page. He clicked on the section “adult entertainment” and it displayed a similar list of categories as mentioned earlier under the “adult” section. He clicked on the category “escorts” and a page was displayed with the following “Posting Rules:”

You agree to the following when posting in this category:

- *I will not post obscene or lewd and lascivious graphics or photographs which depict genitalia, actual or simulated sexual acts or naked images;*
- *I will not post any solicitation directly or in "coded" fashion for any illegal service, including exchanging sexual favors for money or other valuable consideration;*
- *I will not post any material on the Site that exploits minors in any way;*
- *I will not post any material on the Site that in any way constitutes or assists in human trafficking;*
- *I am at least 18 years of age or older and not considered to be a minor in my state of residence.*

Any post exploiting a minor in any way will be subject to criminal prosecution and will be reported to the Cybertipline for law enforcement.

Postings violating these rules and our Terms of Use are subject to removal without refund.¹

Fichtner clicked on a button at the bottom of the page to continue the posting process. The next page displayed a blank template for entering the title, description, age, location, email address, and photos or videos for the ad. A fee of \$10.00 was listed for this category. Toward the bottom of the page, upgrades to the ad were offered for additional fees. Upgrades included automatically reposting the ad to the top of the page or highlighting the ad with a “thumbnail.” The cost varied for reposting an ad from “4 times a day for \$40.00” to “104 times a day for \$960.00.” The cost of a thumbnail ranged from “1 week for \$10.20” to “52 times a week for \$530.40.”

¹ While BACKPAGE.COM claims to strictly follow the rules encountered by Fichtner, and your Affiant is aware that BACKPAGE.COM has specific sexual verbiage its moderators are instructed to restrict, when I conducted a random search of the BACKPAGE.COM escort section, I viewed numerous “escort” ads that contained photos and videos that depicted full nudity, and many of the restricted words spelled in different ways or where letters were separated by symbols to defeat BACKPAGE.COM’s internal moderation. Many of these nude ads were simulating and/or depicting people performing sexual acts. BACKPAGE.COM states they moderate their ads and implement a policy against posting obscene or lewd and lascivious graphics and photographs; however, my personal observations have indicated otherwise throughout the numerous human trafficking investigations I have conducted over the past several years.

He posted the following undercover adult escort advertisement using similar content and verbiage as other ads:

Title: *Sweet dreams do come true! Call me!*

Description: *Hi, I'm Terra ;) I'm in town for a short time and would like to make your dreams come true. I'm clean, safe, and 100% independent. I'm available 24/7. Let's party together, you'll leave with a smile!*

Real pic, no fakes

Please be clean and polite

No blocked calls

No drama, serious callers only

Min 30min/\$100 – \$175/hr

Call/txt me – 916.960.8443

Love, Terra ;

Age: *24*

Photo: *(Fichtner attached a photo of an adult female dressed in a slip and high heels. No genitalia or breast were exposed and the photo did not show the woman's face.)*

Location: *Sacramento*

E-mail address: Katiecatt19@gmail.com

Auto Repost Ad: *1 day after 12:00 p.m. / 8 times for \$80.00*

Sponsor Ad (thumbnail): *2 weeks for \$21.20*

Once the template was completed, Fichtner was directed to click on the “Continue” button at the bottom of the page. However, next to the “Continue” button was the statement “By placing this ad I agree to the terms of use and privacy policy.”

He continued to the next page of the process which displayed a preview of the advertisement and listed the cost of \$111.20 to post the ad. He clicked on the “Post Ad Now” button and was forwarded to the payment page requesting payment by credit card or Bitcoin. Fichtner paid with a credit card utilizing state provided funds. Below the “Submit” payment button, it stated “The charge will appear on your statement as: BP NATIONAL, Payment Solutions BV., Strawinskylaam 601, 1077XX, Amsterdam, Netherlands.” At approximately 0852 hrs, he clicked on the “Submit” button and received a “Thank you.”

Immediately after posting the ad, an email was sent from sacramento.BACKPAGE.COM to the email address he provided when posting the ad (katiecatt19@gmail.com). The email offered a

thank you for posting the ad and that the ad was “pending” and “will be released soon.” The email noted the posting date, the expiration date, and the cost of the ad.

It should be noted that the phone number provided in the advertisement is an undercover cell phone that was activated on March 5, 2015 for the purpose of receiving calls for this ad. Special Agent Tera Mackey agreed to monitor and document all calls and texts received at this number from the ad.

Within minutes of the ad going live, Mackey began receiving calls and texts. She received her first call/text shortly after 0900 hrs.

After completing the posting of the advertisement of the “escort” ad, Fichtner placed a second ad on BACKPAGE.COM for the sale of a sofa. The purpose of posting this ad was to get an idea of how many calls an adult escort service ad would receive compared to that of a non-adult service ad.

He posted the sofa ad under the “buy, sell, trade” section on BACKPAGE.COM. No minimum fee was required for this ad. He completed the template for posting the ad as follows:

Title: *Sofa for sale!*

Description: *Comfortable olive green sofa. Clean/no stains. Great condition. Call/txt – 916.960.844*

Sell price: *\$150.00*

Location: *Sacramento*

E-Mail address: katiecatt19@gmail.com

Photo: *(I attached two photos of an olive green sofa)*

Auto repost: *1 day after 12:00 p.m. / 26 times for \$1.02*

Sponsor ad (thumbnail): *2 weeks for \$0.20*

In the end, the ad cost \$1.22 because of the extra upgrades. He paid the fee with an undercover credit card utilizing state provided funds. Immediately after posting the ad, at approximately 0900 hrs, BACKPAGE.COM sent a confirmation email to katiecatt19@gmail.com thanking me for posting the ad. The email stated the posting was now “live.” There was no “pending” notification. After pulling up the ad to review it, Fichtner realized he forgot to add the undercover (UC) phone number in the advertisement and reposted the ad with the phone number (916) 960-8443. This is the same phone number used in the escort ad. The cost of reposting the ad was \$1.32. BACKPAGE.COM immediately sent another email to katiecatt19@gmail.com notifying me that the ad was “live.”

Mackey continued to monitor the UC phone during the time the escort advertisement and sofa advertisement were active. Mackey told Fichtner she received hundreds of inquiries for the escort ad, but only one inquiry for the sofa ad posted during the time the ads were active. Mackey said

the calls and texts related to the escort ad were requests for sexual favors in exchange for money-prostitution.

On March 16, 2015, Fichtner called and spoke to CARL FERRER, identifying himself as law enforcement and reporting the advertisement he posted as being an ad for prostitution. Fichtner reached FERRER at 214-757-8492. FERRER asked him to verify his law enforcement status, as BACKPAGE.COM had been previously spoofed by people trying to get someone else's ad removed; however, CARL FERRER told Fichtner that he would investigate and remove the ad. Later that day BACKPAGE.COM removed the ad. On March 17, 2015, Fichtner reached BACKPAGE.COM's General Counsel Liz McDougal on the phone. He told her about the ad for prostitution, and that he had noticed numerous other ads on BACKPAGE.COM that appeared to be for prostitution. When pressed as to why BACKPAGE.COM does not restrict these ads, McDougal pointed to the First Amendment, and McDougal claimed that prostitution was not going away and that allowing prostitution ads to be posted on BACKPAGE.COM provides law enforcement with an ally to track and identify suspects. Neither FERRER nor McDougal indicated that they were unaware of the true nature of ads being posted on BACKPAGE.COM.

Fichtner paid for the undercover ads using a Union Bank credit card. Upon receipt of a search warrant, Union Bank provided Fichtner with documents showing that the money from his credit card account went to Borgun H.F., an online payment service in Iceland. A CA DOJ auditor reviewed internal BACKPAGE.COM emails showing the transfer of large amounts of money from Borgun H.F. to BACKPAGE.COM bank accounts in the United States. These are the same accounts that are used to pay salaries and bonuses to LACEY, LARKIN, and FERRER.

May 2015

On May 5, 2015, Rocklin Police Department Det. Zackary Krempin and Fichtner posted an adult escort ad on BACKPAGE.COM for the Sacramento Region, and received multiple emails in response to the ad asking about availability and a desire to meet up for sexual acts. In addition, two of the emails requested sexual favors by using internet prostitution slang and acronyms, such as "Greek"(anal sexual intercourse) and "bbbjcim" (bare back blow job cum in mouth).

Search Warrants:

On July 2, 2015, Fichtner, obtained a search warrant (#63-017880) through the Superior Court of California in Placer County for records from Google Inc. related to the email account that belongs to BACKPAGE.COM's CEO CARL FERRER. On July 13, 2015, he received a response from Google that included over 21,000 emails.

On August 26, 2015, Fichtner obtained another search warrant through the Superior Court of California in Placer County (#63-017987) for records from Google Inc., for all emails with the domain name @BACKPAGE.COM including the email address for JIM LARKIN at . Google responded with over 4 million emails and attachments.

Review of those documents revealed the following:

In 2004, BACKPAGE.COM was founded by LARKIN and LACEY, and FERRER managed the site's operation. In 2012, BACKPAGE.COM separated from its parent company, and LACEY and LARKIN remained controlling shareholders of BACKPAGE.COM, while FERRER became Chief Executive Officer (CEO).

BACKPAGE.COM is similar to Craigslist.org in that it is an online general classified advertising site. The adult services section on BACKPAGE.COM contains ads for prostitution, body rubs, massages, escort, and other sexual services for sale. Nearly naked persons in provocative positions are pictured in nearly every adult services advertisement on BACKPAGE.COM, and the site charged a fee to the user to post advertisements for "escorts" and other similar "services." This "fee to post" or payment system was restructured in July 2015, once credit card companies ceased doing business with BACKPAGE.COM.

When the largest classified service, Craigslist.org, shut down its "Adult Services" category in 2012, "Adult" ads migrated to BACKPAGE.COM, and BACKPAGE.COM capitalized on this increased traffic by raising its fees. BACKPAGE.COM also expanded operations, creating sites in hundreds of cities throughout the world, including over 30 cities in California.

In late 2014, FERRER bought BACKPAGE.COM through two of his Delaware companies—CF Holdings and CF Acquisitions—and created BACKPAGE.COM's new parent company, the Netherlands-based UGC Tech Group C.V. (UGC). FERRER is the only named partner of UGC and remained the CEO of BACKPAGE.COM. FERRER publicly described the sale as part of BACKPAGE.COM's international expansion.

Additionally, FERRER devised a way to promote BACKPAGE.COM by creating other prostitution-related sites. BACKPAGE.COM owns and operates Evilempire.com and Bigcity.com using content it developed from BACKPAGE.COM users. According to internal records obtained via search warrant, this practice increased BACKPAGE.COM's share of the online sex advertising market.

As an example, Evilempire.com's homepage purports to be an "escort phone number directory." The site presents a series of photos, mostly featuring provocatively dressed females, with phone numbers listed. These photos are hyperlinked to posts containing common indicators of prostitution, such as donations associated with time periods, and each post includes a link to the associated BACKPAGE.COM ad. The linked BACKPAGE.COM ads include essentially identical information to the Evilempire.com posts, from the photos to the contact information. Evilempire.com offers no apparent way for users to submit content, indicating that all of the content was derived from BACKPAGE.COM (in other words, a BACKPAGE.COM escort directory). Evilempire.com functions as an additional platform for BACKPAGE.COM escort ads.

BACKPAGE.COM acknowledges that pimps routinely pay BACKPAGE.COM for ads trafficking children for sex. Your Affiant is aware that the National Center for Missing and Exploited Children (NCMEC), among others, informed LACEY, LARKIN, and FERRER of the high number of children exploited on BACKPAGE.COM. Review of these internal documents also reveal discussions of the prostitution of adults that is ongoing in the adult escort section. In reviewing BACKPAGE.COM's email, Fichtner also observed numerous law enforcement subpoenas and search warrants served on BACKPAGE.COM for sex trafficking investigations

and BACKPAGE.COM's responses. These email responses include the requested copies of BACKPAGE.COM's prostitution advertisement. FERRER was copied on these responses.

FERRER and other BACKPAGE.COM representatives including General Counsel Liz McDougal have also publicly acknowledged that ongoing prostitution occurs on BACKPAGE.COM, but claim to have mitigated criminal activity through a screening process. However, the obvious nature of the "escort" ads on BACKPAGE.COM make it plain that BACKPAGE.COM's "escort" ads are for prostitution. CA DOJ conducted undercover operations both posting "escort" ads and arranging meetings with people advertised in the "escort" section. Commercial sex was the only purpose of both buyers and sellers.

While FERRER currently runs the day-to-day operations for BACKPAGE.COM, he and other high level personnel in BACKPAGE.COM's structure report regularly to LARKIN and LACEY.

BACKPAGE.COM emails and financial records obtained via search warrant show that LACEY and LARKIN regularly receive "bonuses" from BACKPAGE.COM's bank accounts. For instance, in September 2014, LACEY and LARKIN each received a \$10 million bonus. Emails also show regular updates, correspondence, and meeting notices between all three Defendants.

CA DOJ Investigative Auditors Darrel Early and Robert Smith examined BACKPAGE.COM's internal financial records and revenue spreadsheets, which were obtained via search warrant. Their examination focused on BACKPAGE.COM revenue that was attributable to California-based sales.

The BACKPAGE.COM revenue report obtained includes California-based revenue covering the time period of January 2013 through May 2015, broken down into six regions. BACKPAGE.COM's internal records break out the percentage of revenue attributable to Adult Services. From January 2013 through March 2015, 99% of BACKPAGE.COM's gross revenue (worldwide income) was directly attributable to adult ads. In April 2015, this percentage dropped to 97% and in May 2015, it further dropped to 90%. The timing of this decrease coincides with the decision of credit card companies like American Express to stop processing BACKPAGE.COM payments.

During this 29-month period, BACKPAGE.COM's gross monthly income from California rose \$1.5 million/month to \$2.5 million/month. During this reporting period (Jan 2013 – May 2015), BACKPAGE.COM self-reported \$51,723,615.23 in revenue derived from California. Approximately \$50,920,739.36 of this derived from adult entertainment advertising (98.43%). Further examination of BACKPAGE.COM records demonstrated that California, during this reporting period (Jan 2013 – May 2015), was responsible for 14.95% of BACKPAGE.COM's worldwide income.

BACKPAGE.COM internal records further break down the revenue that is attributable to adult entertainment. Adult ads include the subcategories of: Adult Jobs; Body Rubs; Datelines; Domination; Female Escorts; Fetish; Male Escorts; Strippers; and Transsexual Escorts. BACKPAGE.COM records state that the worldwide revenue for these subcategories for June 22-28, 2015 was \$3,137,646.28. Revenue attributable to California for this week was 17% of the total revenue or \$545,952.54. Female Escorts generated 72.8% of this revenue; Body Rubs 18.8%; and Transsexual Escorts 5.5%. All other subcategories were less than 1%.

Until July 2015, BACKPAGE.COM required payment for ads featuring content related to commercial sex acts, particularly in the escort category. These payments could be made by credit card. During the same time, BACKPAGE.COM allowed users to post ads for free in non-Adult sections of the site, such as furniture sales. To avoid scrutiny by banks or other credit card processors BACKPAGE.COM controlled the nature of the customer information provided to the payment processor. In a May 2015 email, FERRER asked this question of one of his payment processing partners:

“Do you think we should not send email addresses to processors/banks when we do transactions?”

Example of customer email addresses:

We could send an account number instead? Do the banks see these email addresses when we send the transaction to the processor? We think for example Chase might block transactions for their card holders based on overtly sexy email address names...

In July 2015, major credit cards stopped processing BACKPAGE.COM transactions and BACKPAGE.COM began to allow users to post adult ads for free. Nonetheless, BACKPAGE.COM has continued to collect fees for promoted or sponsored ads, and created complex payment processing procedures to avoid detection from financial institutions.

Review of the emails by SA Fichtner and his team also revealed that as CEO of BACKPAGE.COM CARL FERRER travels regularly to the Netherlands to conduct BACKPAGE business and to deal with Dutch business partners such as Cracker and AdTech BV. FERRER typically will leave for periods of 10 days to 3 weeks and conducts business in transit and from that remote location during his absence from the Dallas office. Review of FERRER’s email also indicate his continuing partnership with AdTech of Amsterdam and his efforts to set up meetings, open new bank accounts, and expand his business in Amsterdam as of August 2016. His email also reflects that he is copied on emails and responds to them continuously while traveling internationally. That flow of communication, the online nature of BACKPAGE.COM, and modern business practice indicate FERRER’s likely use of multiple devices including, but not limited to, a cell phone, smart phone, tablet and/or laptop computer for FERRER’s longer and more voluminous emails and attachments.

Review of FERRER’s emails also indicate that he traveled to the Amsterdam in mid-September on approximately September 15, 2016, and will return on Thursday, October 6, 2016. Emails also suggest that FERRER is traveling with his wife, and that they have traveled to Germany during this European trip. FERRER and his wife will be flying from Amsterdam to Houston, Harris County, Texas to arrive at approximately 2:45 p.m. CST on Thursday, October 6, 2016.

BACKPAGE.COM is a Dutch-owned company, thus your Affiant has reason to believe that FERRER has conducted business on this trip while in Amsterdam.

SAs Fichtner and Mackey have reached CARL FERRER on two separate phones. The first is the 214-757-8492 mentioned earlier in the warrant. This is believed to be a landline that forwards to FERRER's cell phone. The second number is his cell 602-206-9506. That number is confirmed as FERRER's cell both in internal company emails and also by the voicemail which opens with "Hi, this is Carl..."

Email review also indicates that CARL FERRER specifically opened a commercial account for BACKPAGE.COM with Spirit of Texas Bank. The bank is headquartered at 625 University Drive East, College Station, Texas, 77840, according to filings with the Texas Department of Savings and Mortgage Lending and the Texas Secretary of State. BACKPAGE.COM's account was opened in late June/early July of 2014, with an initial deposit of \$190,000. The account (Account No.) was used until it was closed due to "the controversy" in August 2015, and handled \$399,000 plus in deposits related to proceeds from American Express credit card transactions. The average balance in this account was \$794,960.29 between August 1, 2014 to September 1, 2014. FERRER's initial emails with the Spirit of Texas Bank indicated that he planned to keep an average balance of \$750,000 in the account. According to FERRER, he opened this account with a "smaller" bank because BACKPAGE.COM's "first amendment" advocacy was "too much for a bank like Chase." Other emails also indicate that BACKPAGE.COM's adult escort ad customers were being repeatedly turned down for payment processing by Chase Bank.

Victim Interviews:

SAs Mackey and Fichtner have obtained search warrants for advertisement records from BACKPAGE.COM of sex trafficking victims that were advertised in the escort section. The records contained information regarding the payment that BACKPAGE.COM received for the ads.

Mackey and Fichtner interviewed several of these victims. These victims are identified by their initials in this document.

In October 2015, CA DOJ agents interviewed A. H., 27-year-old woman, who was identified as posting advertisements for commercial sex in the escort section of BACKPAGE.COM. A.H. was one of the individuals contacted by SA Dewar during his prostitution sting. Working with SA Dewar, on April 28, 2014, SA Pohle responded to a BACKPAGE.COM posting and set up a meeting with A.H., who was posing as "Jessica". Working in an undercover capacity, SA Pohle negotiated sex acts in exchange for money. During CA DOJ's interview with A.H., she admitted to posting multiple advertisements in the escort section of BACKPAGE.COM for the purpose of offering sex for money. A.H. stated that she began posting escort advertisements on BACKPAGE.COM after Craigslist shut down their escort section and MyRedbook.com, a prostitution website, was shut down by the federal government. A.H. told the agents she would receive numerous calls from her ads and each time she met the person it ended with her providing sex for money. She said it was a rare occasion when it did not. A.H. stated she used the money she made directly from prostitution to pay for the posting fee of her BACKPAGE.COM

advertisements. A search for A.H.'s ads revealed continuous postings for a roughly two-year period, including after the CA DOJ operation. A search for her ads revealed postings in Sacramento, Los Angeles, Monterey, and Modesto.

On January 8, 2016, Mackey interviewed S. C., a 29-year-old female, who has been identified as a victim of sex trafficking. S.C. admitted to advertising on BACKPAGE.COM for the purpose of engaging in sex for money. She described BACKPAGE.COM as a known prostitution site. S.C. said BACKPAGE.COM is an escort service to solicit sexual encounters and that the majority of the victims using BACKPAGE.COM have a pimp because there is not enough time to continually update the advertisement and work at the same time. She said all the calls she got from her BACKPAGE.COM ad were for sexual purposes. S.C. said she paid for her advertisements using pre-paid credit cards. S.C. stated she had two children during the time she was being trafficked, and never learned how to change a diaper or take care of a child because she was always being prostituted.

On August 18, 2016, Fichtner interviewed L. B., a 23-year-old female, who has been identified as a victim of sex trafficking. L.B. stated she began using BACKPAGE.COM in 2012 after being introduced to the prostitution lifestyle by her sister who was also prostituting. When asked to describe BACKPAGE.COM and L.B. described it as a “prostitution thing....all prostitutes go on there to sell their bodies.” L.B. said she posted advertisements in the escort section of BACKPAGE.COM for the sole purpose to solicit calls from individuals to have sex for money. When asked if L.B. ever used BACKPAGE.COM for anything other than posting ads in the escort section and she said “no.” She said all of the individuals she met from her ad ended with her having sex for money. L.B. described having to pay BACKPAGE.COM to post some of her advertisements. L.B. said she used the money from having sex to pay for posting or reposting her advertisements. L.B. said she did not have any other income except for the money she made from prostitution. Postings of her ads were found in California cities, including Los Angeles, Long Beach, and the Inland Empire.

On August 11, 2016, CA DOJ agents interviewed K.A., a 21-year-old female that is believed to be a victim of sex trafficking. K.A. said she was 18 years old when she started posting escort ads on BACKPAGE.COM. K.A. said that 80-90% of the people she met through her ad ended up paying to have sex with her. K.A. said she made up to \$1,000.00 a day and would use a portion of that money to repost her ads. K.A. said she had a boyfriend who knew she was posting ads on BACKPAGE.COM, but denied that he was involved. K.A. stated she paid for most of her escort ads using Bitcoin. K.A. explained that she would buy Amazon gift cards and then sell them on the website Paxful.com for Bitcoin. K.A. said she learned about BACKPAGE.COM from friends who also posted escort ads. K.A. has only used BACKPAGE.COM to post escort ads. K.A. said she knows people can use BACKPAGE.COM to sell other things, but has never known anyone to use for anything other than the escort section. I asked K.A. if BACKPAGE.COM ever prevented or interfered with her posting escort ads on their website and she said no. K.A. said she knew that BACKPAGE.COM did not allow certain words, language, or nudity in the ads so she avoided those things. Her ads were found posted in Sacramento, California.

Fichtner was able to obtain transaction records through BACKPAGE.COM verifying that each of the victims, with the exception of E.S., made payments to BACKPAGE.COM for their advertisements.

Texas Surveillance and Documentary Research:

On August 23, 2016, your Affiant traveled to the suspected business location of CARL FERRER at 2501 Oak Lawn Ave. Suite 700, Dallas, Texas. I parked on the first level of the parking garage and entered the building. I went up to the 7th floor where suite 700 is believed to be located. Upon exiting the elevator on the 7th floor, I stepped into a small dead end hallway that made a small “L” shape. To the right of the elevator I observed large non-transparent frosted glass double doors with what appeared to be a secured electronic card or key reader for entry. To the left of the elevator was a large wooden door with a mail slot in the center of the door that appeared to be locked. Beside that door was a small desk with instructions taped to it explaining how to remit payment to a company named “Posting Solutions” for ads being posted and a basket containing envelopes. The instructions stated to place the payments in a provided envelope and put it in the mail slot. These same instructions were taped to the door. To the right of the desk was another large wooden door with what appeared to be a secured electronic card or key reader for entry. There was no visibility through the doors and the suite number was not marked. Documentary research later revealed that Posting Solutions is another company affiliated with BACKPAGE.COM.

Your Affiant then left the 7th floor and traveled to the bottom floor of the parking garage located on B3. Upon exiting the elevator, I observed a vehicle previously identified as being registered to CARL FERRER, a Black 2012 Mercedes M35 bearing License Plate of . I exited the parking garage and parked on the street to observe the exits so that I could verify that CARL FERRER was the driver of this car.

In order to observe all exits of the business, your Affiant requested the assistance of TX OAG Fugitive Unit Investigators to assist with conducting surveillance. TX OAG Sgt. Howell, Sgt. Smith, and Sgt. Balson responded. At approximately 5:25 p.m., Sgt. Howell notified other investigators that he observed CARL FERRER exit the business from the Oak Lawn Ave. exit driving the black Mercedes. Sgt. Howell followed FERRER on to the Dallas North Toll Way

traveling north bound. This is the straightest route of travel to FERRER'S residence previously determined to be located at 2531 Tumble Weed Way, Frisco, TX. Your Affiant picked up the surveillance at this point and loosely followed FERRER to his residence. Upon arrival at 2531 Tumble Weed Way, Frisco, TX, I observed the black Mercedes backed in to the driveway at the rear of the house. I further observed a white 2011 Mercedes C30 4 door car bearing license plate [REDACTED] which I confirmed was also registered to FERRER to be parked directly in front of the residence.

In addition to surveilling the Oak Lawn and Frisco locations, your Affiant did additional research to determine who had access to and ownership of the relevant locations. Denton County Appraisal Documents indicate that FERRER is the owner of the home on Tumble Weed Way, while Dallas County Appraisal Documents list him as the owner of suite 700 at 2501 Oak Lawn. The City of Dallas Certificate of Occupancy application documents filed September 2, 2016 by BACKPAGE.COM indicate that suite 700 of the building at 2501 Oak Lawn is approximately 15,300 square feet in dimension, and the city's subsequent Certificate of Occupancy issued to BACKPAGE.COM on September 15, 2016 indicates the same. The internal directory posted inside 2501 Oak Lawn also lists suite 700 as belonging to BACKPAGE.COM, and this address is also listed with the Texas Secretary of State. BACKPAGE.COM's self-published Law Enforcement Guide also lists the address at 2501 Oak Lawn in Dallas.

Texas Workforce Commission records reveal that FERRER receives his personal income from Backpage through two affiliated companies, Website Technologies and Amstel River Holdings, LLC, both of which list 2501 Oak Lawn, Dallas, TX, 75219, as their address. Public information reports filed with the Texas Secretary of State by BACKPAGE.COM and Website Technologies show Dartmoor Holdings, LLC as a 100% shareholder of both companies. Separate banking records indicate that FERRER is the owner of Dartmoor Holdings, LLC. In contrast, a corporate disclosure statement filed by CARL FERRER's counsel with the United States Court of Appeals in Case No. 16-5232 in the Washington D.C. Circuit Court of Appeals states BACKPAGE.COM is a subsidiary of and owned by several other privately held companies to include Dartmoor Holdings, LLC and Amstel River Holdings, LLC which are both linked to FERRER and BACKPAGE.

Texas Secretary of State records further reveal that as of September 2, 2015, BACKPAGE.COM legally changed its entity name to Ad Data Solutions, LLC, doing business as BACKPAGE.COM. The Texas Workforce Commission did not show any wages paid to any employees by BACKPAGE.COM or Ad Data Solutions, but did show that Website Technologies paid 77 employees, including FERRER.

Your Affiant states that she has reviewed the aforementioned information obtained by California sworn law enforcement personnel during their investigation, believes such to be true and correct and, that she believes such personnel that participated in the investigation to be credible and reliable. When combined with her own portion of the investigation, training, and experience, your

Affiant believes that CARL FERRER is in violation of Texas Penal Code 34.02 - Money Laundering based on violations of California's Pimping Statutes, and that evidence of such offenses are located on his person or within his possession.

WHEREFORE, based on the facts, circumstances, the training of your Affiant, and the information noted in this document, your Affiant asks for issuance of a warrant that will authorize the collection of evidentiary photographs of suspected persons, to search said suspected persons, and to search said suspected persons' luggage, bags, or other storage containers unknown to affiant capable of storing said property, seize the same, and transport said property to the Texas Attorney General's Office, 300 W. 15th Street, Austin, Travis County, Texas for purposes of safekeeping, scientific analysis, and completion of any investigation or proceedings related to the activities described in the Affidavit upon which the foregoing warrant was issued. Your Affiant asks that a digital forensics investigator be granted authorization to examine, make duplicate images/copies of the above-mentioned electronic media and to determine if evidence of the offenses enumerated above are contained therein. Evidence copies of the items relating to these offenses will be created and retained for further proceedings.

Sgt. Cora Gray
Affiant, Sergeant Cora Gray

SWORN TO AND SUBSCRIBED BEFORE ME BY SAID AFFIANT ON THIS THE
5 DAY OF OCTOBER, 2016.

[Signature]
NOTARY

[Signature]
CPCJ District Judge
Dallas County, Texas

Burns

