

IN THE DISTRICT COURT DALLAS COUNTY, TEXAS  
162ND JUDICIAL DISTRICT

J.S., S.L., L.C.

Plaintiffs,

vs.

VILLAGE VOICE MEDIA  
HOLDINGS, L.L.C., D/B/A  
BACKPAGE.COM; CAUSE NO. DC-16-14700  
BACKPAGE.COM, L.L.C.; NEW  
TIMES MEDIA, L.L.C., D/B/A  
BACKPAGE.COM;  
AND BARUTI HOPSON

Defendants.

ATTORNEYS' EYES ONLY  
DEPOSITION OF  
CARL FERRER

TAKEN ON  
TUESDAY, DECEMBER 6, 2016  
9:08 A.M.

PERKINS COIE  
500 NORTH AKARD STREET, SUITE 3300  
DALLAS, TEXAS 75201

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APPEARANCES

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FOR THE PLAINTIFFS:

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APPEARANCES CONTINUED

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APPEARANCES CONTINUED

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FOR THE WITNESS:

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1 ATTORNEYS' EYES ONLY  
2 DEPOSITION OF  
3 CARL FERRER  
4 TAKEN ON  
5 TUESDAY, DECEMBER 6, 2016  
6 9:08 A.M.  
7  
8 THE VIDEOGRAPHER: We are on the record.  
9 The time is 9:09. This is the beginning of the  
10 deposition of Carl Ferrer.  
11 Will Counsels introduce yourselves and  
12 state whom you represent.  
13 MR. HENZE: Yes. Tom Henze, H-e-n-z-e;  
14 and I represent the witness, Mr. Ferrer.  
15 MS. MCDUGALL: Liz McDougall, General  
16 Counsel, Backpage.com.  
17 MR. SCHNEIDER: Harry Schneider on behalf  
18 of the Backpage, defendants.  
19 MR. AMALA: Jason Amala on behalf of  
20 plaintiffs.  
21 MR. BAUER: Erik Bauer on behalf of the  
22 plaintiffs.  
23 MR. NAPPO: Vincent Nappo on behalf of  
24 plaintiffs.  
25 MR. HENZE: Can you repeat that?

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1 MR. NAPPO: Vincent Nappo.  
2 MR. HENZE: You're Vincent. Okay.  
3 MR. NAPPO: Yeah.  
4 THE VIDEOGRAPHER: And the court reporter  
5 will now swear in the witness.  
6 THE REPORTER: Raise your right hand.  
7 Do you solemnly swear to tell the truth,  
8 the whole truth, and nothing but the truth, so help  
9 you God?  
10 THE WITNESS: I do.  
11 THE REPORTER: Thank you.  
12 THE VIDEOGRAPHER: Please begin.  
13 MR. CARL FERRER, having been first duly sworn,  
14 testified as follows:  
15 EXAMINATION  
16 Q. Please state and spell your full name for  
17 the record.  
18 A. I'm sorry. Say that again.  
19 Q. Can you please state and spell your full  
20 name for the record?  
21 A. Carl Ferrer. Carl, C-a-r-l; Ferrer, F-e-  
22 r-r-e-r.  
23 Q. Where do you currently live?  
24 A. [REDACTED]  
25 Q. What's your address?

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1 **A.** [REDACTED]  
2 [REDACTED]  
3 Q. How long have you lived there?  
4 **A.** [REDACTED]  
5 Q. Do you have any plans to be out of the  
6 country in May of 2017?  
7 **A. Sorry. Could you say that again?**  
8 **I can barely hear you.**  
9 Q. I'll try to speak up.  
10 **A. Head cold.**  
11 Q. Both of us. Do you have any plans to be  
12 out of the country in May of 2017?  
13 **A. On the advice of Counsel, I assert my**  
14 **rights as set forth in Amendment 5 to the**  
15 **Constitution of the United States and decline to**  
16 **answer.**  
17 Q. What's your date of birth?  
18 **A.** [REDACTED]  
19 Q. Are you currently employed?  
20 **A. On the advice of Counsel, I assert my**  
21 **rights as set forth in Amendment 5 to the**  
22 **Constitution of the United States and decline to**  
23 **answer.**  
24 Q. Who is your employer?  
25 **A. On the advice of Counsel, I assert my**

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1 **rights as set forth in Amendment 5 to the**  
2 **Constitution of the United States and decline to**  
3 **answer.**  
4 MR. HENZE: Mr. Amala, pursuant to our  
5 conversation that we had prior to commencing, from  
6 this point forward, may I suggest that in lieu of  
7 the exact words that the witness has put on to the  
8 record when asserting his -- his privileges pursuant  
9 to Amendment 5, that we'll shorten that and it would  
10 mean the same thing as the longer answer and he will  
11 simply, when invoking, say "I decline to answer;  
12 Amendment 5."  
13 MR. AMALA: That's accept -- acceptable to  
14 us.  
15 Q. (BY MR. AMALA) My understanding is if you  
16 say "I decline to answer based on Amendment 5," my  
17 understanding is you're refusing to answer the  
18 question based on the First and Fifth Amendment of  
19 the Constitution; okay?  
20 **A. Yes.**  
21 Q. All right. Are you represented by Counsel  
22 at today's deposition?  
23 **A. Yes.**  
24 Q. All right. Who's your attorney?  
25 **A. Mr. Tom Henze.**

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1 Q. When did you retain Mr. Henze?  
2 **A. Let's see. I've had him as Counsel for**  
3 **years.**  
4 Q. Do you have a current retainer agreement  
5 with Mr. Henze?  
6 **A. I decline to answer; Amendment 5.**  
7 Q. How much is Mr. Henze being paid to  
8 represent you?  
9 **A. I decline to answer; Amendment 5.**  
10 Q. Who is paying Mr. Henze's legal fees?  
11 **A. I decline to answer; Amendment 5.**  
12 Q. Is anyone associated with the website  
13 Backpage.com paying for Mr. Henze's legal fees?  
14 **A. I decline to answer; Amendment 5.**  
15 Q. All right. The company's paying for --  
16 strike that.  
17 Backpage.com is paying for Mr. Henze's  
18 legal fees, correct?  
19 **A. I decline to answer; Amendment 5.**  
20 Q. Do you have an agreement with anyone else,  
21 either any person or entity, regarding who's paying  
22 your legal fees?  
23 **A. I decline to answer; Amendment 5.**  
24 Q. Are you being represented in the criminal  
25 proceedings in California where you were a named

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1 defendant?  
2 **A. I decline to answer; Amendment 5.**  
3 Q. All right. Who is paying for your legal  
4 fees in the criminal proceedings in California where  
5 you were named as a defendant?  
6 **A. I decline to answer; Amendment 5.**  
7 Q. Is Backpage.com paying for your legal fees  
8 in the criminal proceedings in California?  
9 **A. I decline to answer; Amendment 5.**  
10 Q. Have you communicated with anyone other  
11 than your attorney regarding today's deposition?  
12 MR. HENZE: Excuse me. Did you say  
13 "attorney" singular?  
14 MR. AMALA: Correct.  
15 **A. I decline to answer; Amendment 5.**  
16 Q. (BY MR. AMALA) Did you speak with general  
17 Counsel for Backpage.com, Liz McDougall, in order to  
18 prepare for this day's deposition?  
19 **A. I decline to answer; Amendment 5.**  
20 Q. You spoke with Liz McDougall, Counsel for  
21 Backpage.com, in order to prepare for today's  
22 deposition, correct?  
23 **A. I decline to answer; Amendment 5.**  
24 Q. You spoke with Andrew Padilla in order to  
25 prepare for today's deposition, correct?

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1 **A. I decline to answer; Amendment 5.**  
2 Q. Do you have any health conditions that  
3 affect your memory?  
4 **A. I decline to answer; Amendment 5.**  
5 Q. Are you on any medications that affect  
6 your memory?  
7 **A. I decline to answer; Amendment 5.**  
8 Q. Have you ever been arrested?  
9 **A. I decline to answer; Amendment 5.**  
10 Q. Where were you born?  
11 **A. [REDACTED]**  
12 Q. Where did you grow up?  
13 **A. [REDACTED].**  
14 Q. Did you go to high school?  
15 **A. Yes.**  
16 Q. Did you graduate?  
17 **A. Yes.**  
18 Q. What high school did you graduate from?  
19 **A. [REDACTED]**  
20 Q. What year did you graduate?  
21 **A. 1979.**  
22 Q. Did you go on -- go on to any additional  
23 formal higher education?  
24 **A. Yes.**  
25 Q. What did you do for additional higher

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1 education?  
2 **A. Went to school, went to college.**  
3 Q. What school did you go to?  
4 **A. [REDACTED]**  
5 Q. And what did you study there?  
6 **A. English, business.**  
7 Q. Did you ever receive a -- a degree from a  
8 college or university?  
9 **A. Yes.**  
10 Q. From where?  
11 **A. [REDACTED]**  
12 Q. What was the degree in?  
13 **A. I think bachelors, English and**  
14 **communications.**  
15 Q. What year was that?  
16 **A. 1984 --**  
17 Q. Did you go on to any --  
18 **A. -- to the best of my knowledge.**  
19 Q. Did you go on to any additional higher  
20 education after receiving your bachelors in  
21 approximately 1984?  
22 **A. No.**  
23 Q. Can give me a thumbnail sketch of your  
24 employment history after receiving your bachelors in  
25 approximately 1984?

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1 **A. On the advice of Counsel -- whoop, I'll go**  
2 **with the short answer -- I decline to answer;**  
3 **Amendment 5.**  
4 Q. Have you ever worked on a website called  
5 Backpage.com?  
6 **A. I decline to answer; Amendment 5.**  
7 Q. All right. How was it that you came to  
8 work for a website called Backpage.com?  
9 **A. I decline to answer; Amendment 5.**  
10 Q. How did you first learn about a position  
11 with Backpage.com?  
12 **A. I decline to answer; Amendment 5.**  
13 Q. Who was your employer during the time that  
14 you worked on Backpage.com?  
15 **A. I decline to answer; Amendment 5.**  
16 Q. All right. How have you been paid for the  
17 work that you have done for Backpage.com?  
18 **A. I decline to answer; Amendment 5.**  
19 Q. All right. Who issued your paychecks  
20 during the time that you've worked on Backpage.com?  
21 **A. I decline to answer; Amendment 5.**  
22 Q. Have you worked -- ever worked on a  
23 commission for your work related to Backpage.com?  
24 **A. I decline to answer; Amendment 5.**  
25 Q. Have you ever received any of the profits

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1 from the operation of Backpage.com?  
2 **A. I decline to answer; Amendment 5.**  
3 Q. You have received some of the profits from  
4 the operation of Backpage.com, correct?  
5 **A. I decline to answer; Amendment 5.**  
6 Q. How much have you earned working on  
7 Backpage.com?  
8 **A. I decline to answer; Amendment 5.**  
9 Q. All right. What positions have you held  
10 with Backpage.com?  
11 **A. I decline to answer; Amendment 5.**  
12 Q. All right. What were your job  
13 responsibilities for each of the positions that you  
14 worked in for Backpage.com?  
15 **A. I decline to answer; Amendment 5.**  
16 Q. Did you receive any type of training in  
17 order to start working for Backpage.com?  
18 **A. I decline to answer; Amendment 5.**  
19 Q. During the time that you've worked on  
20 Backpage.com, who have you reported to?  
21 **A. I decline to answer; Amendment 5.**  
22 Q. What is your knowledge of the allegations  
23 in this case?  
24 MR. HENZE: I'm sorry, Counsel, I just  
25 didn't hear you.

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1 Q. (BY MR. AMALA) Sure. What are -- what is  
2 your knowledge of the allegations in this case?  
3 **A. I decline to answer; Amendment 5.**  
4 Q. What is the basis of your knowledge  
5 regarding the allegations in this case?  
6 **A. I decline to answer; Amendment 5.**  
7 Q. You understand that the plaintiffs in this  
8 case are -- well, strike that.  
9 You understand that the plaintiffs in this  
10 case were trafficked for sex on Backpage.com,  
11 correct?  
12 MR. HENZE: Objection, form.  
13 **A. I decline to answer; Amendment 1 and 5.**  
14 Q. (BY MR. AMALA) You understand that the  
15 plaintiffs in this claim -- case alleged that they  
16 were trafficked for sex on the website Backpage.com  
17 in the year 2000, correct -- I'll strike that and  
18 ask again.  
19 You understand that the plaintiffs in this  
20 case alleged that they were trafficked for sex on  
21 the website Backpage.com in the year 2010, correct?  
22 **A. I decline to answer; Amendment 1 and 5.**  
23 Q. You understand that the plaintiffs in this  
24 case were advertised for sex on the website  
25 Backpage.com in 2010 when they were minor children,

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1 Q. Do you know how the website Backpage.com  
2 came into existence?  
3 **A. I decline to answer; Amendment 1 and  
4 Amendment 5.**  
5 Q. How did Backpage.com come into existence?  
6 **A. I decline to answer; Amendment 1 and  
7 Amendment 5.**  
8 Q. Do you know who started the website  
9 Backpage.com?  
10 **A. I decline to answer; Amendment 1 and  
11 Amendment 5.**  
12 Q. All right. You helped to create the  
13 website Backpage.com, correct?  
14 **A. I decline to answer; Amendment 1 and  
15 Amendment 5.**  
16 Q. Do you know who shared in any profits from  
17 the operation of Backpage.com in 2009?  
18 **A. I decline to answer; Amendment 1 and  
19 Amendment 5.**  
20 Q. You personally profited from the operation  
21 of Backpage.com in 2009, correct?  
22 **A. I decline to answer; Amendment 1 and  
23 Amendment 5.**  
24 Q. Do you know who shared in any profits from  
25 the operation of Backpage.com in 2010?

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1 correct?  
2 **A. I'm sorry. Could you ask that question  
3 again?**  
4 Q. You understand that the plaintiffs in this  
5 case were advertised for sex on Backpage.com in 2010  
6 when they were minor children, correct?  
7 **A. I decline to answer; Amendment 1 and  
8 Amendment 5.**  
9 Q. You support adult prostitution, correct?  
10 **A. I decline to answer; Amendment 5.**  
11 Q. You support allowing an adult to help  
12 prostitutes market and sell their services, correct?  
13 **A. I decline to answer; Amendment 1 and  
14 Amendment 5.**  
15 Q. You support child prostitution, correct?  
16 **A. I decline to answer; Amendment 1 and  
17 Amendment 5.**  
18 Q. You support allowing others to profit from  
19 sex trafficking, correct?  
20 **A. I decline to answer; Amendment 1 and  
21 Amendment 5.**  
22 Q. You support allowing others to profit from  
23 the trafficking of children, correct?  
24 **A. I decline to answer; Amendment 1 and  
25 Amendment 5.**

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1 **A. I decline to answer; Amendment 1 and  
2 Amendment 5.**  
3 Q. You personally profited from the operation  
4 of Backpage.com in 2010, correct?  
5 **A. I decline to answer; Amendment 1 and  
6 Amendment 5.**  
7 Q. You know who shared in the profits from  
8 the operation of Backpage.com from 2011 to the  
9 present?  
10 **A. I decline to answer; Amendment 1 and  
11 Amendment 5.**  
12 Q. You personally profited from the operation  
13 of Backpage.com from 2011 to present, correct?  
14 **A. I decline to answer; Amendment 1 and  
15 Amendment 5.**  
16 Q. Do you know where the profits from the  
17 operation of Backpage.com have been deposited from  
18 2009 to present?  
19 **A. I decline to answer; Amendment 1 and  
20 Amendment 5.**  
21 Q. You have caused profits from the operation  
22 of Backpage.com to be transferred out of the United  
23 States, correct?  
24 **A. I'm sorry. Could you state that question  
25 again?**

Page 20

1 Q. You have caused profits from the operation  
2 of Backpage.com to be transferred out of the United  
3 States, correct?  
4 **A. I decline to answer; Amendment 1 and**  
5 **Amendment 5.**  
6 Q. You have caused profits from the operation  
7 of Backpage.com to be transferred out of the United  
8 States in order to conceal the profits from the  
9 United States government, correct?  
10 **A. I decline to answer; Amendment 1 and**  
11 **Amendment 5.**  
12 Q. You have caused profits from the operation  
13 of Backpage.com to be transferred out of the United  
14 States in order to conceal the profits from law  
15 enforcement, correct?  
16 **A. I decline to answer; Amendment 1 and**  
17 **Amendment 5.**  
18 Q. You have caused profits from the operation  
19 of Backpage.com to be transferred out of the United  
20 States in order to conceal the profits from the  
21 plaintiffs in this lawsuit, correct?  
22 **A. I decline to answer; Amendment 1 and**  
23 **Amendment 5.**  
24 Q. You have caused profits from the operation  
25 of Backpage.com to be transferred out of the United

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1 States in order to conceal the profits from the  
2 plaintiffs in this lawsuit in the event they are  
3 successful and obtain a judgment against the  
4 company, correct?  
5 **A. I decline to answer; Amendment 1 and**  
6 **Amendment 5.**  
7 Q. All right. Do you know who has had  
8 control over the operations of Backpage.com from its  
9 inception to present?  
10 **A. Could you state the question again?**  
11 Q. Do you know who -- do you know who has had  
12 control over the operations of Backpage.com from its  
13 inception to the present?  
14 **A. I decline to answer; Amendment 1 and**  
15 **Amendment 5.**  
16 Q. You have had control over the operations  
17 of Backpage.com from its inception to the present,  
18 correct?  
19 **A. I decline to answer; Amendment 1 and**  
20 **Amendment 5.**  
21 Q. You have had control over what content is  
22 posted in the escort section of the website  
23 Backpage.com from its inception to present, correct?  
24 **A. I decline to answer; Amendment 1 and**  
25 **Amendment 5.**

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1 Q. Have you ever contacted a woman for paid  
2 sex through an advertisement on Backpage.com?  
3 **A. I decline to answer; Amendment 1 and**  
4 **Amendment 5.**  
5 Q. You have contacted a woman for paid sex  
6 through an advertisement on Backpage.com, correct?  
7 **A. I decline to answer; Amendment 1 and**  
8 **Amendment 5.**  
9 Q. You did that in 2009, correct?  
10 **A. I decline to answer; Amendment 1 and**  
11 **Amendment 5.**  
12 Q. You did that in 2010 as well, correct?  
13 **A. I decline to answer; Amendment 1 and**  
14 **Amendment 5.**  
15 Q. Have you ever contacted a child for paid  
16 sex through an advertisement on Backpage.com?  
17 **A. I decline to answer; Amendment 1 and**  
18 **Amendment 5.**  
19 Q. You have contacted a child for paid sex  
20 through an advertisement on Backpage.com, correct?  
21 **A. I decline to answer; Amendment 1 and**  
22 **Amendment 5.**  
23 Q. You did that in 2009, correct?  
24 **A. I decline to answer; Amendment 1 and**  
25 **Amendment 5.**

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1 Q. You also did that in 2010, correct?  
2 **A. I decline to answer; Amendment 1 and**  
3 **Amendment 5.**  
4 Q. Have you ever paid a woman for sex after  
5 contacting her through an advertisement on  
6 Backpage.com by giving her free ads on the website  
7 Backpage.com?  
8 **A. I decline to answer; Amendment 1 and**  
9 **Amendment 5.**  
10 Q. You have paid a woman for sex after  
11 contacting her through an advertisement on  
12 Backpage.com by giving her free ads on the website,  
13 correct?  
14 **A. I decline to answer; Amendment 1 and**  
15 **Amendment 5.**  
16 Q. You did that in 2009, correct?  
17 **A. I decline to answer; Amendment 1 and**  
18 **Amendment 5.**  
19 Q. And you did that in 2010 as well, correct?  
20 **A. I decline to answer; Amendment 1 and**  
21 **Amendment 5.**  
22 Q. Have you ever paid a woman for sex after  
23 contacting her through an advertisement on  
24 Backpage.com by giving her pimp free ads on the  
25 website?

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1 **A. I decline to answer; Amendment 1 and**  
 2 **Amendment 5.**  
 3 Q. You have paid a woman for sex after  
 4 contacting her through an ad on Backpage.com by  
 5 giving her pimp free ads on the website, correct?  
 6 **A. I decline to answer; Amendment 1 and**  
 7 **Amendment 5.**  
 8 Q. You did that in 2009, correct?  
 9 **A. I decline to answer; Amendment 1 and**  
 10 **Amendment 5.**  
 11 Q. You did that in 2010, correct?  
 12 **A. I decline to answer; Amendment 1 and**  
 13 **Amendment 5.**  
 14 Q. All right. As of 2010, you knew that  
 15 children were being trafficked for sex on the  
 16 website Backpage.com, correct?  
 17 **A. I decline to answer; Amendment 1 and**  
 18 **Amendment 5.**  
 19 Q. All right. As of 2010, the management of  
 20 Backpage.com knew that children were being  
 21 trafficked for sex on the website, correct?  
 22 **A. I decline to answer; Amendment 1 and**  
 23 **Amendment 5.**  
 24 Q. As of 2010, you knew that children were  
 25 being trafficked for sex through the escort section

Page 25

1 of the website Backpage.com, correct?  
 2 **A. I decline to answer; Amendment 1 and**  
 3 **Amendment 5.**  
 4 Q. As of 2010, the management of Backpage.com  
 5 knew that children were being trafficked for sex  
 6 through the escort section of the website  
 7 Backpage.com, correct?  
 8 **A. I decline to answer; Amendment 1 and**  
 9 **Amendment 5.**  
 10 Q. All right. As of January 2010, you knew  
 11 that children were being trafficked for sex through  
 12 the escort section of the website Backpage.com,  
 13 correct?  
 14 **A. I decline to answer; Amendment 1 and**  
 15 **Amendment 5.**  
 16 Q. As of January 2010, the management of  
 17 Backpage.com knew that children were being  
 18 trafficked for sex through the escort web section of  
 19 the website Backpage.com, correct?  
 20 **A. I decline to answer; Amendment 1 and**  
 21 **Amendment 5.**  
 22 Q. All right. As of January 2010, you knew  
 23 that children who were being trafficked for sex  
 24 through the escort section of the website  
 25 Backpage.com were likely to suffer severe emotional

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1 distress, correct?  
 2 **A. I decline to answer; Amendment 1 and**  
 3 **Amendment 5.**  
 4 Q. As of January 2010, the management of  
 5 Backpage.com knew that children who were being  
 6 trafficked for sex through the escort section of the  
 7 website Backpage.com were likely to suffer severe  
 8 emotional distress, correct?  
 9 **A. I decline to answer; Amendment 1 and**  
 10 **Amendment 5.**  
 11 Q. All right. As of January 2010, you took  
 12 no steps to prevent children from being trafficked  
 13 for sex through the escort section of the website  
 14 Backpage.com, correct?  
 15 **A. I decline to answer; Amendment 1 and**  
 16 **Amendment 5.**  
 17 Q. As of January 2010, the management of  
 18 Backpage.com took no steps to prevent children from  
 19 being trafficked for sex through the escort section  
 20 of the website Backpage.com, correct?  
 21 **A. I decline to answer; Amendment 1 and**  
 22 **Amendment 5.**  
 23 Q. As of January 2010, you allowed the same  
 24 advertisements of children to be posted on the  
 25 website even after the website received complaints

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1 that the advertisements were of children correct?  
 2 **A. I decline to answer; Amendment 1 and**  
 3 **Amendment 5.**  
 4 Q. As of January 2010, the management of  
 5 Backpage.com allowed the same advertisements of  
 6 children to be posted on the website even after the  
 7 website received complaints that the advertisements  
 8 were of children, correct?  
 9 **A. I decline to answer; Amendment 1 and**  
 10 **Amendment 5.**  
 11 Q. One of your goals for Backpage.com is to  
 12 be the largest source of online sex trafficking in  
 13 the United States, correct?  
 14 **A. I decline to answer; Amendment 1 and**  
 15 **Amendment 5.**  
 16 Q. That has been one of the goals of the  
 17 management of Backpage.com as well, correct?  
 18 **A. I decline to answer; Amendment 1 and**  
 19 **Amendment 5.**  
 20 Q. That was one of your goals before 2010,  
 21 correct?  
 22 **A. I decline to answer; Amendment 1 and**  
 23 **Amendment 5.**  
 24 Q. And that was one of your goals during 2010  
 25 as well, correct?

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1 **A. I decline to answer; Amendment 1 and**  
2 **Amendment 5.**  
3 Q. That was one of the management's goals  
4 before 2010, correct?  
5 **A. I decline to answer; Amendment 1 and**  
6 **Amendment 5.**  
7 Q. And that was one of management's goals  
8 throughout 2010 as well, correct?  
9 **A. I decline to answer; Amendment 1 and**  
10 **Amendment 5.**  
11 Q. All right. You've known since the time  
12 that Craigslist shut down its adult section that  
13 Backpage.com was the largest source of online sex  
14 trafficking in the United States, correct?  
15 **A. Could you state the question again?**  
16 Q. You have known since Craigslist shut down  
17 its adult services section that Backpage.com is the  
18 largest source of online sex trafficking in the  
19 United States, correct?  
20 **A. I decline to answer; Amendment 1 and**  
21 **Amendment 5.**  
22 Q. The management of Backpage.com has known  
23 that as well, correct?  
24 **A. I decline to answer; Amendment 1 and**  
25 **Amendment 5.**

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1 Q. When you started Backpage.com, you  
2 intentionally created an online marketplace for sex  
3 trafficking, correct?  
4 **A. I decline to answer; Amendment 1 and**  
5 **Amendment 5.**  
6 Q. When the website was first created, the  
7 management of Backpage.com also intentionally  
8 created an online marketplace for sex trafficking,  
9 correct?  
10 **A. Could you state the question again?**  
11 Q. When Backpage.com was created, the  
12 management of Backpage.com was intentionally  
13 creating an online marketplace for sex trafficking,  
14 correct?  
15 **A. I decline to answer; Amendment 1 and**  
16 **Amendment 5.**  
17 Q. You have personally taken steps to create  
18 an online marketplace for sex trafficking on  
19 Backpage.com, correct?  
20 **A. I decline to answer; Amendment 1 and**  
21 **Amendment 5.**  
22 Q. The management of Backpage.com has  
23 actively taken steps to create an online marketplace  
24 for sex trafficking, correct?  
25 **A. I decline to answer; Amendment 1 and**

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1 **Amendment 5.**  
2 Q. One of those steps for creating an online  
3 marketplace for sex trafficking was creating posting  
4 rules for users, correct?  
5 **A. Could you state the question again?**  
6 Q. One of those steps in creating an online  
7 marketplace for sex trafficking was creating posting  
8 rules for users, correct?  
9 **A. I decline to answer; Amendment 1 and**  
10 **Amendment 5.**  
11 Q. When those posting rules were created, you  
12 knew that the posting rules would help sex  
13 traffickers avoid prosecution by law enforcement,  
14 correct?  
15 **A. I decline to answer; Amendment 1 and**  
16 **Amendment 5.**  
17 Q. And the management knew the same thing,  
18 correct?  
19 **A. I decline to answer; Amendment 1 and**  
20 **Amendment 5.**  
21 Q. Another step taken by you in order to  
22 create an online marketplace for sex trafficking on  
23 Backpage.com was the creation of content  
24 requirements, correct?  
25 **A. I decline to answer; Amendment 1 and**

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1 **Amendment 5.**  
2 Q. Management of Backpage.com knew that that  
3 was the purpose of the content requirements as well,  
4 correct?  
5 **A. I decline to answer; Amendment 1 and**  
6 **Amendment 5.**  
7 Q. The entire purpose of the posting rules  
8 was to help sex traffickers avoid detection by law  
9 enforcement, correct?  
10 **A. I decline to answer; Amendment 1 and**  
11 **Amendment 5.**  
12 Q. That was one of your goals with the  
13 posting rules, correct?  
14 **A. I decline to answer; Amendment 1 and**  
15 **Amendment 5.**  
16 Q. And that was one of the goals of  
17 management of Backpage.com with regard to the  
18 posting rules as well, correct?  
19 **A. I decline to answer; Amendment 1 and**  
20 **Amendment 5.**  
21 Q. And one of your goals with creating the  
22 content requirements was to promote sex trafficking  
23 on the website Backpage.com as well, correct?  
24 **A. Could you state the question again?**  
25 MR. AMALA: Can you read that one back?

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1 THE REPORTER: QUESTION: "And one of your  
2 goals with creating the content requirements was to  
3 promote sex trafficking on the website Backpage.com  
4 as well, correct?"

5 **A. I decline to answer; Amendment 1 and  
6 Amendment 5.**

7 Q. (BY MR. AMALA) And the management of  
8 Backpage.com understood that that was one of the  
9 purposes of the content requirements as well,  
10 correct?

11 **A. I decline to answer; Amendment 1 and  
12 Amendment 5.**

13 Q. You have understood since the website  
14 Backpage.com was created that the entire purpose of  
15 the escort section of the website is to promote sex  
16 trafficking, correct?

17 **A. I decline to answer; Amendment 1 and  
18 Amendment 5.**

19 Q. And the purpose for creating an online  
20 marketplace for sex trafficking was so you could  
21 profit from the ads posted in the escort section for  
22 sex trafficking, correct?

23 **A. I decline to answer; Amendment 1 and  
24 Amendment 5.**

25 Q. All right. The management of Backpage.com

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1 has known since the website was created that the  
2 entire purpose of the escort section of the website  
3 is to promote sex trafficking so the company can  
4 profit from that section, correct?

5 **A. I decline to answer; Amendment 1 and  
6 Amendment 5.**

7 Q. Before and during the time that the  
8 plaintiffs were advertised for sex on the website  
9 Backpage.com, you were intentionally developing the  
10 website's reputation as a website for sex  
11 trafficking, correct?

12 **A. I decline to answer; Amendment 1 and  
13 Amendment 5.**

14 Q. Before and during the time that the  
15 plaintiffs were advertised for sex on Backpage.com,  
16 the management of Backpage.com was intentionally  
17 developing the website's reputation as a website for  
18 sex trafficking, correct?

19 **A. I decline to answer; Amendment 1 and  
20 Amendment 5.**

21 Q. Before and during the time that the  
22 plaintiffs were advertised for sex on Backpage.com,  
23 you knew that virtually every advertisement in the  
24 escort section of the website was an advertisement  
25 for illegal sex, correct?

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1 **A. I decline to answer; Amendment 1 and  
2 Amendment 5.**

3 Q. Management knew that virtually every  
4 advertisement in the escort section of the website  
5 was an advertisement for illegal sex as well,  
6 correct?

7 **A. I decline to answer; Amendment 1 and  
8 Amendment 5.**

9 Q. How much money did Backpage.com generate  
10 in profit from illegal sex trafficking in 2008?

11 **A. I decline to answer; Amendment 1 and  
12 Amendment 5.**

13 Q. How much money did you profit from illegal  
14 sex trafficking in 2008?

15 **A. I decline to answer; Amendment 1 and  
16 Amendment 5.**

17 Q. You profited from illegal sex trafficking  
18 in 2008 off of Backpage.com, correct?

19 **A. I decline to answer; Amendment 1 and  
20 Amendment 5.**

21 Q. How much money did Backpage.com generate  
22 in profit from illegal sex trafficking in 2009?

23 **A. I decline to answer; Amendment 1 and  
24 Amendment 5.**

25 Q. You personally profited from illegal sex

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1 trafficking on Backpage.com in 2009, correct?

2 **A. I decline to answer; Amendment 1 and  
3 Amendment 5.**

4 Q. How much money did Backpage.com generate  
5 in profit from illegal sex trafficking on the  
6 website in 2010?

7 **A. I decline to answer; Amendment 1 and  
8 Amendment 5.**

9 Q. You personally profited from sex  
10 trafficking on Backpage.com in 2010, correct?

11 **A. I decline to answer; Amendment 1 and  
12 Amendment 5.**

13 Q. You personally profited millions of  
14 dollars from ads for sex trafficking in the escort  
15 section of web -- of Backpage.com, correct?

16 **A. I decline to answer; Amendment 1 and  
17 Amendment 5.**

18 Q. As of January 2010, you knew that  
19 Backpage.com was the largest source of sex  
20 trafficking in the United States, correct?

21 **A. I decline to answer; Amendment 1 and  
22 Amendment 5.**

23 Q. Management understood at the time that  
24 Backpage.com had become the largest source of sex  
25 trafficking in the United States, correct?

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1 **A. I decline to answer; Amendment 1 and**  
 2 **Amendment 5.**  
 3 Q. As of January 2010, you knew that hundreds  
 4 of children were being advertised for sex in the  
 5 escort section of the website Backpage.com, correct?  
 6 **A. I decline to answer; Amendment 1 and**  
 7 **Amendment 5.**  
 8 Q. Management of Backpage.com knew that as  
 9 well, correct?  
 10 **A. I decline to answer; Amendment 1 and**  
 11 **Amendment 5.**  
 12 Q. As of January 2010, you knew that  
 13 Backpage.com was generating millions of dollars in  
 14 profit from children being advertised for sex in the  
 15 escort section of the website Backpage.com, correct?  
 16 **A. Could you state the question again?**  
 17 Q. As of January 2010, you knew that the  
 18 website Backpage.com was generating millions of  
 19 dollars in profit from children being advertised for  
 20 sex in the escort section of the website  
 21 Backpage.com, correct?  
 22 **A. I decline to answer; Amendment 1 and**  
 23 **Amendment 5.**  
 24 Q. The management of Backpage.com knew that  
 25 as well, correct?

1 **A. I decline to answer; Amendment 1 and 5.**  
 2 Q. As of 2010, you knew that thousands of  
 3 children were being advertised for sex each day in  
 4 the escort section of Backpage.com, correct?  
 5 **A. I decline to answer; Amendment 1 and 5.**  
 6 Q. The management of Backpage.com knew that  
 7 as well, correct?  
 8 **A. I decline to answer; Amendment 1 and 5.**  
 9 Q. As of January 2010, you knew that the  
 10 website Backpage.com could reduce the number of  
 11 children being trafficked for sex, being trafficked  
 12 on the website, if it required photo identification  
 13 for ads posted in the escort section, correct?  
 14 **A. Could you state the question again?**  
 15 Q. Sure. As of January 2010, you knew that  
 16 the website Backpage.com could reduce the number of  
 17 children being trafficked for sex on the website if  
 18 it required photo identification for ads posted in  
 19 the escort section, correct?  
 20 **A. I decline to answer; Amendment 1 and 5.**  
 21 Q. The management of Backpage.com knew that  
 22 as well, correct?  
 23 **A. I decline to answer; Amendment 1 and 5.**  
 24 Q. As of January 2010, you knew that the  
 25 website Backpage.com could reduce the number of

1 children being trafficked for sex on the website if  
 2 it required photo identification for ads posted in  
 3 the escort section, but you chose not to require  
 4 photo identification because you wanted to continue  
 5 profiting off of ads for children for sex, correct?  
 6 **A. It's a long question. Could you state it**  
 7 **again?**  
 8 Q. Sure. As of 2010, you knew that the  
 9 website Backpage.com could reduce the number of  
 10 children being trafficked for sex on the website if  
 11 it required photo identification of ads posted in  
 12 the escort section, but you chose not to require  
 13 photo identification because you wanted to continue  
 14 profiting off of ads of children for sex, correct?  
 15 **A. I decline to answer; Amendment 1 and 5.**  
 16 Q. Management of Backpage.com knew that as  
 17 well, correct?  
 18 **A. I decline to answer; Amendment 1 and**  
 19 **Amendment 5.**  
 20 Q. But the management of Backpage.com  
 21 declined to require photo identification because it,  
 22 management, wanted to continue profiting from ads of  
 23 children for sex, correct?  
 24 **A. I decline to answer; Amendment 1 and 5.**  
 25 Q. As of January 2010, you knew that the

1 website Backpage.com was doing nothing to  
 2 meaningfully verify the age of people who were the  
 3 subject of advertisements in the escort section of  
 4 the website, correct?  
 5 **A. I decline to answer; Amendment 1 and 5.**  
 6 Q. Management of Backpage.com knew that as  
 7 well, correct?  
 8 **A. I decline to answer; Amendment 1 and 5.**  
 9 Q. As of January 2010, you knew that  
 10 requiring users to click a button indicating that  
 11 they were 18 or older did nothing to actually  
 12 prevent children from being -- from being advertised  
 13 for sex on the website Backpage.com, correct?  
 14 **A. I decline to answer; Amendment 1 and 5.**  
 15 Q. The management of Backpage.com knew that  
 16 as well, correct?  
 17 **A. I decline to answer; Amendment 1 and 5.**  
 18 Q. As of January 2010, you knew that  
 19 requiring users to click a button indicating that  
 20 they were 18 or older was not preventing children  
 21 from being advertised for sex on the website,  
 22 correct?  
 23 **A. I decline to answer; Amendment 1 and 5.**  
 24 Q. The management of Backpage.com knew that  
 25 as well, correct?

1 **A. I decline to answer; Amendment 1 and 5.**  
2 Q. You have been part of the management of  
3 Backpage.com since the website's inception, correct?  
4 **A. I decline to answer; Amendment 1 and 5.**  
5 Q. You were part of the management of  
6 Backpage.com in 2008, correct?  
7 **A. I decline to answer; Amendment 1 and 5.**  
8 Q. You were part of the management of  
9 Backpage.com in 2009, correct?  
10 **A. I decline to answer; Amendment 1 and 5.**  
11 Q. You were part of the management of  
12 Backpage.com in 2010, correct?  
13 **A. I decline to answer; Amendment 1 and 5.**  
14 Q. And you have been part of the management  
15 of Backpage.com from 2011 to present, correct?  
16 **A. I decline to answer; Amendment 1 and 5.**  
17 Q. As part of the management of Backpage.com,  
18 you have held numerous meetings with other managers  
19 to discuss how to increase the amount of sex  
20 trafficking in the escort section of the website,  
21 correct?  
22 **A. I decline to answer; Amendment 1 and 5.**  
23 Q. You held those meetings in 2009, correct?  
24 **A. I decline to answer; Amendment 1 and 5.**  
25 Q. You held those meetings in 2010 as well,

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1 correct?  
2 **A. I decline to answer; Amendment 1 and 5.**  
3 Q. All right. As of January 2010, you knew  
4 that children were in high demand in the illegal  
5 marketplace for sex trafficking that was occurring  
6 in the escort section of Backpage.com, correct?  
7 **A. I decline to answer; Amendment 1 and 5.**  
8 Q. Management knew that as well, correct?  
9 **A. I decline to answer; Amendment 1 and 5.**  
10 Q. Okay. Since the website's inception to  
11 present, you've personally had ultimate control over  
12 the website Backpage.com, correct?  
13 **A. I decline to answer; Amendment 1 and 5.**  
14 Q. You had that control in 2009, correct?  
15 **A. I decline to answer; Amendment 1 and 5.**  
16 Q. And you had that control in 2010 as well,  
17 correct?  
18 **A. I decline to answer; Amendment 1 and 5.**  
19 Q. As of January 2010, you knew that users  
20 who posted ads in the escort section were posting  
21 ads of women and children for paid sex, correct?  
22 **A. I decline to answer; Amendment 1 and 5.**  
23 Q. And management of Backpage.com knew that  
24 as well, correct?  
25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. As of January 2010, you knew that you were  
2 profiting from users who posted ads in the escort  
3 section of Backpage.com of women and children for  
4 sex, correct?  
5 **A. I'm sorry could you state the question**  
6 **again?**  
7 Q. As of January 2010, you knew that you were  
8 profiting from users who posted ads in the escort  
9 section of the website of women and children for  
10 paid for sex, correct?  
11 **A. I decline to answer; Amendment 1 and 5.**  
12 Q. Management knew that as well, correct?  
13 **A. I decline to answer; Amendment 1 and 5.**  
14 Q. As of January 2010, you knew that the --  
15 some of the children who were being advertised for  
16 sex in the escort section of the website  
17 Backpage.com were having sex with more than ten men  
18 a day, correct?  
19 **A. I decline to answer; Amendment 1 and 5.**  
20 Q. Management of Backpage.com knew that as  
21 well, correct?  
22 **A. I decline to answer; Amendment 1 and 5.**  
23 Q. As of January 2010, you knew that sex  
24 traffickers knew that Backpage.com was the best  
25 place to go if they wanted to advertise women and

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1 children for sex, correct?  
2 **A. I decline to answer; Amendment 1 and 5.**  
3 Q. Management of Backpage.com knew that as  
4 well, correct?  
5 **A. I decline to answer; Amendment 1 and 5.**  
6 Q. You didn't take any steps to prevent sex  
7 trafficking in the escort section of Backpage.com  
8 because you wanted to continue profiting from that  
9 sex trafficking, correct?  
10 **A. I decline to answer; Amendment 1 and 5.**  
11 Q. The management of Backpage.com declined to  
12 do anything about the sex trafficking occurring in  
13 the escort section of the website because management  
14 wanted to continue profiting from the sex  
15 trafficking ads, correct?  
16 **A. I decline to answer; Amendment 1 and 5.**  
17 Q. As of January 2010, you had ordered that  
18 Backpage.com hire people to revise ads that were  
19 being posted on the website in order to make it less  
20 obvious that the ads were for sex, correct?  
21 **A. Could you state that again?**  
22 Q. Sure. As of January 2010, you ordered  
23 Backpage.com to hire people to revise ads that were  
24 being posted in the escort section of the website in  
25 order to make the ads less obvious that they were

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1 for paid sex, correct?  
2 **A. I decline to answer; Amendment 1 and 5.**  
3 Q. And As of January 2010, management knew  
4 that you had ordered such people to be hired,  
5 correct?  
6 **A. I decline to answer; Amendment 1 and 5.**  
7 Q. All right. As of January 2010, you knew  
8 that Backpage.com was training people to review and  
9 revise ads in the escort section of the website to  
10 make it so that the ads appeared less obvious that  
11 they were for paid sex, correct?  
12 **A. I decline to answer; Amendment 1 and 5.**  
13 Q. Management of Backpage.com knew that was  
14 occurring as well, correct?  
15 **A. I decline to answer; Amendment 1 and 5.**  
16 Q. As of January 2010, you knew that  
17 individuals called moderators were revising ads that  
18 were being posted in the escort section of the  
19 website in order to make the ads less obvious that  
20 they were for paid sex, correct?  
21 **A. I decline to answer; Amendment 1 and 5.**  
22 Q. The management of Backpage.com knew that  
23 was occurring as well, correct?  
24 **A. I decline to answer; Amendment 1 and 5.**  
25 Q. As of January 2010, you were marketing the

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1 website Backpage.com as a marketplace for sex  
2 trafficking, correct?  
3 **A. I decline to answer; Amendment 1 and 5.**  
4 Q. As of January 2010, the management of  
5 Backpage.com knew that the website was being  
6 marketed as a marketplace for sex trafficking,  
7 correct?  
8 **A. I decline to answer; Amendment 1 and 5.**  
9 Q. As of January 2010, you knew that  
10 thousands and thousands of prostitution  
11 advertisements were being posted in the escort  
12 section of the website every day, correct?  
13 **A. I decline to answer; Amendment 1 and 5.**  
14 Q. Management knew that as well, correct?  
15 **A. I decline to answer; Amendment 1 and 5.**  
16 Q. As of January 2010, you knew that hundreds  
17 of prostitution advertisements were being posted in  
18 the escort section of Backpage.com every single day  
19 in the state of Washington, correct?  
20 **A. I decline to answer; Amendment 1 and 5.**  
21 Q. Management knew that as well, correct?  
22 **A. I decline to answer; Amendment 1 and 5.**  
23 Q. As of January 2010, you knew that selling  
24 sex for money is illegal in the state of Washington,  
25 correct?

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1 **A. I decline to answer; Amendment 1 and 5.**  
2 Q. The management of Backpage.com knew that  
3 as well, correct?  
4 **A. I decline to answer; Amendment 1 and 5.**  
5 Q. As of January 2010, you knew that helping  
6 another person sell sex for money is illegal in the  
7 state of Washington, correct?  
8 **A. I decline to answer; Amendment 1 and 5.**  
9 Q. The management of Backpage.com knew that  
10 as well, correct?  
11 **A. I decline to answer; Amendment 1 and 5.**  
12 Q. As of January 2010, you knew that sex  
13 trafficking is illegal in the state of Washington,  
14 correct?  
15 **A. I decline to answer; Amendment 1 and 5.**  
16 Q. The management of Backpage.com knew that  
17 as well, correct?  
18 **A. I decline to answer; Amendment 1 and 5.**  
19 Q. As of January 2010, you knew that  
20 Backpage.com -- well, strike that.  
21 As of January 2010, you knew that  
22 thousands of prostitution ad -- advertisements had  
23 appeared on the website Backpage.com that targeted  
24 Washington state citizens, correct?  
25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. Okay. The management of Backpage.com knew  
2 that as well, correct?  
3 **A. I decline to answer; Amendment 1 and 5.**  
4 Q. As of January 2010, you knew that  
5 thousands of ads for prostitution had appeared in  
6 the escort section of the website Backpage.com that  
7 targeted citizens of Pierce County, Washington,  
8 correct?  
9 **A. I decline to answer; Amendment 1 and 5.**  
10 Q. The management -- management of  
11 Backpage.com knew that as well, correct?  
12 **A. I decline to answer; Amendment 1 and 5.**  
13 Q. As of January 2010, you knew that  
14 thousands of prostitution advertisements had  
15 appeared in the escort section of the website  
16 Backpage.com that targeted the citizens of King  
17 County, Washington, correct?  
18 **A. I decline to answer; Amendment 1 and 5.**  
19 Q. The management of Backpage.com knew that  
20 as well, correct?  
21 **A. I decline to answer; Amendment 1 and 5.**  
22 Q. As of January 2010, you knew that hundreds  
23 of women from Washington had been advertised for sex  
24 on the website Backpage.com, correct?  
25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. You knew by that point that thousands of  
 2 women from Washington had been advertised for sex in  
 3 the escort section of the website, correct?  
 4 **A. I decline to answer; Amendment 1 and 5.**  
 5 Q. As of January 2010, the management of  
 6 Backpage.com knew that thousands of women from  
 7 Washington had been advertised for sex in the escort  
 8 section of the website Backpage.com, correct?  
 9 **A. I decline to answer; Amendment 1 and 5.**  
 10 Q. As of January 2010, you knew that hundreds  
 11 of women from Pierce County, Washington had been  
 12 advertised for sex on the -- in the escort section  
 13 of the website Backpage.com, correct?  
 14 **A. I decline to answer; Amendment 1 and 5.**  
 15 Q. And the management of Backpage.com knew  
 16 that as well, correct?  
 17 **A. I decline to answer; Amendment 1 and 5.**  
 18 Q. As of January 2010, you knew that children  
 19 were being advertised for sex in the escort section  
 20 of the website Backpage.com, correct?  
 21 **A. Could you state that question again?**  
 22 Q. As of January '10 -- of 2010, you knew  
 23 that children were being advertised for sex in the  
 24 escort section of the website Backpage.com, correct?  
 25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. And the management of Backpage.com knew  
 2 that as well, correct?  
 3 **A. I decline to answer; Amendment 1 and 5.**  
 4 Q. As of January 2010, you knew that the  
 5 business model for the website Backpage.com was  
 6 based on paid advertisements for commercial sex,  
 7 correct?  
 8 **A. I decline to answer; Amendment 1 and 5.**  
 9 Q. And the management of Backpage.com knew  
 10 that as well, correct?  
 11 **A. I decline to answer; Amendment 1 and 5.**  
 12 Q. As of January 2010, you didn't do anything  
 13 to eliminate or reduce sex trafficking on the  
 14 website Backpage.com because you wanted to continue  
 15 profiting from such ads, correct?  
 16 **A. I decline to answer; Amendment 1 and 5.**  
 17 Q. And the management of Backpage.com  
 18 endorsed that decision, correct?  
 19 **A. I decline to answer; Amendment 1 and 5.**  
 20 MR. HENZE: Mr. Amala, it's been almost an  
 21 hour. Can we take a break?  
 22 MR. AMALA: Sure.  
 23 MR. HENZE: Thank you.  
 24 THE VIDEOGRAPHER: One moment. The time  
 25 is now 10:00 o'clock. We are off the record.

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1 (Recess from 10:00 to 10:26)  
 2 THE VIDEOGRAPHER: We are on the record.  
 3 The time is 10:26.  
 4 Q. (BY MR. AMALA) As of January 2010, you  
 5 knew that Backpage.com generated virtually no profit  
 6 for ads for legitimate goods and services, correct?  
 7 **A. I decline to answer; Amendment 1 and**  
 8 **Amendment 5.**  
 9 Q. The management of Backpage.com knew that  
 10 as well, correct?  
 11 **A. I decline to answer; Amendment 1 and**  
 12 **Amendment 5.**  
 13 Q. As of January 2010, you were intentionally  
 14 using advertisements of legitimate goods and  
 15 services as a cover to profit from sex trafficking  
 16 in the escort section of the website Backpage.com,  
 17 correct?  
 18 **A. I decline to answer; Amendment 1 and**  
 19 **Amendment 5.**  
 20 Q. And the management of Backpage.com knew  
 21 that that was occurring as well, correct?  
 22 **A. I decline to answer; Amendment 1 and**  
 23 **Amendment 5.**  
 24 Q. Since the escort section in the website  
 25 Backpage.com was created, you knew that the term

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1 "escort" means prostitution, correct?  
 2 **A. I decline to answer; Amendment 1 and**  
 3 **Amendment 5.**  
 4 Q. The management of Backpage.com knew that  
 5 the term "escort" means prostitution as well,  
 6 correct?  
 7 **A. I decline to answer; Amendment 1 and**  
 8 **Amendment 5.**  
 9 Q. You knew as of January 2010, that by using  
 10 the term "escort" on Backpage.com, you were asking  
 11 sex traffickers to come to the website to post ads  
 12 for prostitution, correct?  
 13 **A. I decline to answer; Amendment 1 and**  
 14 **Amendment 5.**  
 15 Q. Management of Backpage.com knew that as  
 16 well, correct?  
 17 **A. I decline to answer; Amendment 1 and**  
 18 **Amendment 5.**  
 19 Q. As of January 2010, you were using the  
 20 term "escort" on Backpage.com to conceal your  
 21 knowledge that nearly all of the website's profits  
 22 were derived from sex trafficking, correct?  
 23 **A. I decline to answer; Amendment 1 and**  
 24 **Amendment 5.**  
 25 Q. As of January 2010, the management of

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1 Backpage.com was using the term "escort" to try to  
 2 conceal the fact that nearly all of the website's  
 3 profits were derived from sex trafficking, correct?  
 4 **A. I decline to answer; Amendment 1 and  
 5 Amendment 5.**  
 6 Q. As of January 2010, you knew that using  
 7 the term "escort" on the website Backpage.com was a  
 8 way to attract sex traffickers, correct?  
 9 **A. I decline to answer; Amendment 1 and  
 10 Amendment 5.**  
 11 Q. And the management of Backpage knew that  
 12 as well, correct?  
 13 **A. I decline to answer; Amendment 1 and  
 14 Amendment 5.**  
 15 Q. As of January 2010, you knew that the term  
 16 "pimp" refers to a sex trafficker, correct?  
 17 **A. I decline to answer; Amendment 1 and  
 18 Amendment 5.**  
 19 Q. And the management of Backpage.com knew  
 20 that as well, correct?  
 21 **A. I decline to answer; Amendment 1 and  
 22 Amendment 5.**  
 23 Q. As of January 2010, you knew that the term  
 24 "john" refers to someone who wants to purchase sex,  
 25 correct?

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1 **A. I decline to answer; Amendment 1 and 5.**  
 2 Q. And the management of Backpage.com knew  
 3 that as well, correct?  
 4 **A. I decline to answer; Amendment 1 and 5.**  
 5 Q. As of January 2010, you knew that sex  
 6 traffickers were trying to conceal the identity of  
 7 women who they were advertising for sex in the  
 8 escort section of the website, correct?  
 9 **A. Could you state that question again?**  
 10 Q. As of January 2010, the management of back  
 11 -- strike that.  
 12 As of January 2010, you knew that sex  
 13 traffickers were trying to conceal the identity of  
 14 women that they were advertising for sex in the  
 15 escort section of the website, correct?  
 16 **A. I decline to answer --**  
 17 MR. SCHNEIDER: Can I have that one read  
 18 back, please?  
 19 THE REPORTER: Yes.  
 20 QUESTION: "As of January 2010, the  
 21 management -- strike that. "As of January of 2010,  
 22 you knew that" the -- "you knew that sex traffickers  
 23 were trying to conceal the identity of women that  
 24 they were advertising for sex on the website" --  
 25 service -- on the website. "-- section of the

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1 website, correct?"  
 2 I'm sorry. That's how it came up.  
 3 MR. SCHNEIDER: I'll object to the form.  
 4 Q. (BY MR. AMALA) Go ahead.  
 5 **A. Could I hear it -- the question one more  
 6 time?**  
 7 MR. AMALA: Would you like for me to ask  
 8 again?  
 9 THE REPORTER: Yes.  
 10 Q. (BY MR. AMALA) As of January 2010, you  
 11 knew that sex traffickers were trying to conceal the  
 12 identity of women that they were advertising for sex  
 13 in the escort section of the website, correct?  
 14 **A. I decline to answer; Amendment 1 and 5.**  
 15 Q. The management of Backpage.com knew that  
 16 as well, correct?  
 17 **A. I decline to answer; Amendment 1 and 5.**  
 18 Q. As of January 2010, you knew that sex  
 19 traffickers were trying to conceal the identity of  
 20 children that they were advertising for sex in the  
 21 escort section of the website, correct?  
 22 **A. I decline to answer; Amendment 1 and 5.**  
 23 Q. And the management of Backpage.com knew  
 24 that as well, correct?  
 25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. As of January 2010, you knew that sex  
 2 traffickers were trying to conceal the age of  
 3 children who they were advertising for sex in the  
 4 escort section of the website, correct?  
 5 **A. I decline to answer; Amendment 1 and 5.**  
 6 Q. The management of Backpage.com knew that  
 7 as well, correct?  
 8 **A. I decline to answer; Amendment 1 and 5.**  
 9 Q. All right. As of January 2010, you knew  
 10 that sex traffickers were trying to conceal the fact  
 11 that the ads they posted on the website were ads for  
 12 sex by using code words, correct?  
 13 **A. I decline to answer; Amendment 1 and 5.**  
 14 Q. And the management knew that as well,  
 15 correct?  
 16 **A. I decline to answer; Amendment 1 and 5.**  
 17 Q. As of January 2010, you knew that  
 18 virtually every advertisement in the escort section  
 19 of the website had one or more photographs of a  
 20 prostitute in skimpy lingerie, correct?  
 21 **A. I decline to answer; Amendment 1 and 5.**  
 22 Q. And you knew that an advertisement with  
 23 such photographs was more likely than not an  
 24 advertisement for paid sex, correct?  
 25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. And the management of Backpage.com knew  
 2 that as well, correct?  
 3 **A. I decline to answer; Amendment 1 and 5.**  
 4 Q. All right. As of January 2010, you knew  
 5 that virtually every advertisement in the escort  
 6 section of the website Backpage.com had one or more  
 7 photographs showing a prostitute in a sexually  
 8 provocative position, correct?  
 9 **A. Could you restate the question?**  
 10 Q. As of January 2010, you knew that  
 11 virtually every advertisement in the escort section  
 12 of the website Backpage.com had one or more  
 13 photographs showing a prostitute in a sexually  
 14 provocative position, correct?  
 15 **A. I decline to answer; Amendment 1 and 5.**  
 16 Q. And you knew that an advertisement with  
 17 such photographs was more likely than not an  
 18 advertisement for paid sex, correct?  
 19 **A. I decline to answer; Amendment 1 and 5.**  
 20 Q. And the management of Backpage.com knew  
 21 that as well, correct?  
 22 **A. I decline to answer; Amendment 1 and 5.**  
 23 Q. As of January 2010, you were instructing  
 24 the people who were reviewing and revising the ads  
 25 in the escort section of the website Backpage.com to

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1 delete images showing genitalia but then post the  
 2 remainder of the ad, correct?  
 3 **A. I decline to answer; Amendment 1 and 5.**  
 4 Q. In -- you were instructing such images to  
 5 be deleted but the remainder of the ads to be posted  
 6 in order to cover up the fact that you knew that  
 7 such ads were an ad for paid sex, correct?  
 8 **A. Could you repeat the question?**  
 9 MR. AMALA: Can you repeat that one?  
 10 Thank you.  
 11 THE REPORTER: QUESTION: "In -- you were  
 12 instructing such images to be deleted but the  
 13 remainder of the ads to be posted in order to cover  
 14 up the fact that you knew that such ads were for  
 15 paid sex, correct?"  
 16 **A. I decline to answer; Amendment 1 and 5.**  
 17 Q. (BY MR. AMALA) And you wanted to continue  
 18 profiting from such ads, correct?  
 19 **A. I decline to answer; Amendment 1 and 5.**  
 20 Q. The management of Backpage.com, as of  
 21 January 2010, knew that the people who were  
 22 reviewing and revising the ads in the escort section  
 23 of the website were deleting images showing  
 24 genitalia but then posting the remainder of the ad,  
 25 correct?

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1 **A. I decline to answer; Amendment 1 and 5.**  
 2 Q. And management knew that those images were  
 3 being deleted and the rest of the ad being posted  
 4 even though management knew such ads were ads for  
 5 sex, correct?  
 6 **A. I decline to answer; Amendment 1 and 5.**  
 7 Q. And management was okay with that because  
 8 they wanted to continue profiting from such ads,  
 9 correct?  
 10 **A. I decline to answer; Amendment 1 and 5.**  
 11 Q. As of January 2010, you were instructing  
 12 the people who were reviewing and revising the ads  
 13 in the escort section of the website Backpage.com to  
 14 delete images showing female nipples but to then  
 15 post the remainder of the ad, correct?  
 16 **A. I decline to answer; Amendment 1 and 5.**  
 17 Q. You were giving those instructions in  
 18 order to cover up the fact that you knew that ads  
 19 with such images were ads for paid sex, correct?  
 20 **A. I decline to answer; Amendment 1 and 5.**  
 21 Q. And rather than delete those ads and  
 22 prevent them from being posted, you allowed them to  
 23 be posted without those images because you wanted to  
 24 continue profiting from such ads, correct?  
 25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. The management of Backpage.com, as of  
 2 January 2010, knew that the people who were  
 3 reviewing and revising the ads in the escort section  
 4 were deleting images showing female nipples but then  
 5 posting the remainder of the ad, correct?  
 6 **A. I decline to answer; Amendment 1 and 5.**  
 7 Q. And management allowed that to occur  
 8 because they wanted to cover up the fact that the  
 9 ads with such images were ads for paid sex, correct?  
 10 **A. I decline to answer; Amendment 1 and 5.**  
 11 Q. And rather than delete those ads and  
 12 prevent them from being posted at all, management  
 13 allowed the ads to go forward because they wanted to  
 14 continue profiting from such ads, correct?  
 15 **A. I decline to answer; Amendment 1 and 5.**  
 16 Q. As of January 2010, you were instructing  
 17 the people who were reviewing and revising the ads  
 18 in the escort section of the website Backpage.com to  
 19 remove language that expressly indicated the ad was  
 20 an ad for paid sex, correct?  
 21 **A. I decline to answer; Amendment 1 and 5.**  
 22 Q. And after that language was removed, you  
 23 were instructing those people to post the remainder  
 24 of the ad, correct?  
 25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. At the time, you knew that those ads were  
2 ads for paid sex, correct?  
3 A. I decline to answer; Amendment 1 and 5.  
4 Q. And you had that language removed because  
5 you wanted to cover up the fact that you knew those  
6 ads were ads for paid sex, correct?  
7 A. I decline to answer; Amendment 1 and 5.  
8 Q. And you wanted to continue profiting from  
9 such ads, correct?  
10 A. I decline to answer; Amendment 1 and 5.  
11 Q. All right. The management of  
12 Backpage.com, as of January 2010, knew that the  
13 people who were reviewing and revising ads in the  
14 escort section of the website were removing language  
15 that expressly indicated the ad was an ad for paid  
16 sex but then posting the remainder of the ad,  
17 correct?  
18 A. I decline to answer; Amendment 1 and 5.  
19 Q. Management allowed that to occur because  
20 they wanted to cover up the fact that the ads were  
21 for paid sex, correct?  
22 A. I decline to answer; Amendment 1 and 5.  
23 Q. And they wanted to continue profiting from  
24 such ads, correct?  
25 A. I decline to answer; Amendment 1 and 5.

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1 Q. As of January 2010, you were instructing  
2 the people who were reviewing and revising the ads  
3 in the escort section of the website Backpage.com to  
4 edit and revise language that suggested the ad was  
5 an ad for paid sex, correct?  
6 A. I decline to answer; Amendment 1 and 5.  
7 Q. And you were instructing those people to  
8 then post the edited ad, correct?  
9 A. I decline to answer; Amendment 1 and 5.  
10 Q. You instructed those people to revise the  
11 language of the ads and then post the ads because  
12 you wanted to cover up the fact that the ads were  
13 for paid sex, correct?  
14 A. I decline to answer; Amendment 1 and 5.  
15 Q. And you wanted to continue profiting from  
16 such ads, correct?  
17 A. I decline to answer; Amendment 1 and 5.  
18 Q. As of January 2010, the management of  
19 Backpage.com knew that the people who were reviewing  
20 and revising the ads in the escort section of the  
21 website Backpage.com were revising and editing  
22 language that suggested the ad was an ad for paid  
23 sex, correct?  
24 A. I decline to answer; Amendment 1 and 5.  
25 Q. Management knew that the revised and

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1 edited ads were then being posted on the website,  
2 even though they knew the ads were for sex, correct?  
3 A. I decline to answer; Amendment 1 and 5.  
4 Q. Management allowed that to occur because  
5 they wanted to cover up the fact that the website  
6 knew the ads were for paid sex, correct?  
7 A. I decline to answer; Amendment 1 and 5.  
8 Q. Management wanted to continue profiting  
9 from such ads, correct?  
10 A. I decline to answer; Amendment 1 and 5.  
11 Q. As of January 2010, you were instructing  
12 the people who were reviewing and revising the ads  
13 in the escort section of the website Backpage.com to  
14 revise language on the company's list of quote,  
15 "banned terms," closed quote, that suggested the ad  
16 was an ad for sex, correct?  
17 A. Could you state the question again?  
18 Q. Sure. As of January 2010, you were  
19 instructing the people who were reviewing and  
20 revising the ads in the escort section of the  
21 website Backpage.com to revise language on the list  
22 of the company's quote, "banned terms," closed  
23 quote, that suggested the ad was an ad for paid sex,  
24 correct?  
25 A. I decline to answer; Amendment 1 and 5.

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1 Q. The revised ads were then posted on the  
2 website, correct?  
3 A. I decline to answer; Amendment 1 and 5.  
4 Q. And those ads were then posted on the  
5 website, even though Backpage.com knew that the ads  
6 were ads for sex, correct?  
7 A. I decline to answer; Amendment 1 and 5.  
8 Q. And you knew that that was occurring  
9 because you wanted to cover up the fact that the ads  
10 were for paid sex, correct?  
11 A. I decline to answer; Amendment 1 and 5.  
12 Q. And you wanted to continue to profit from  
13 those ads, correct?  
14 A. I decline to answer; Amendment 1 and 5.  
15 Q. All right. Management knew that those ads  
16 were being modified in that way and allowed the ads  
17 to then be posted on the website because they wanted  
18 to continue profiting from such ads, correct?  
19 A. I decline to answer; Amendment 1 and 5.  
20 Q. As of January 2010, you knew that some  
21 users were posting ads in the escort section of the  
22 website Backpage.com that depicted different people  
23 but used the same telephone number, correct?  
24 A. I decline to answer; Amendment 1 and 5.  
25 Q. And you knew that those users were more

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1 likely than not sex traffickers, correct?  
2 **A. I decline to answer; Amendment 1 and 5.**  
3 Q. Management knew that as well, correct?  
4 **A. I decline to answer; Amendment 1 and 5.**  
5 Q. Neither you nor management did anything to  
6 stop those sex traffickers because you and  
7 management wanted to profit from the ads, correct?  
8 **A. I decline to answer; Amendment 1 and 5.**  
9 Q. And to be more clear, you wanted to profit  
10 from the ads posted by those sex traffickers,  
11 correct?  
12 **A. I decline to answer; Amendment 1 and 5.**  
13 Q. As of January 2010, you knew that some  
14 users were posting ads in the escort section of  
15 Backpage.com that depicted different people in the  
16 ads but used the same credit card to pay for the  
17 ads, correct?  
18 **A. I decline to answer; Amendment 1 and 5.**  
19 Q. You knew that those users were more likely  
20 than not sex traffickers, correct?  
21 **A. I decline to answer; Amendment 1 and 5.**  
22 Q. And management knew that as well, correct?  
23 **A. I decline to answer; Amendment 1 and 5.**  
24 Q. Neither you nor management did anything to  
25 stop those sex traffickers because you and

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1 management wanted to continue to profit from their  
2 ads, correct?  
3 **A. I decline to answer; Amendment 1 and 5.**  
4 Q. As of January 2010, you knew that some  
5 users were posting ads depicting different people  
6 but using the same prepaid credit card number to pay  
7 for the ads, correct?  
8 **A. Could you repeat the question?**  
9 Q. As of January 2010, you knew that some  
10 users were posting ads that depicted different  
11 people but used the same prepaid -- prepaid credit  
12 card number to pay for the ads, correct?  
13 **A. I decline to answer; Amendment 1 and 5.**  
14 Q. You knew that such users were more likely  
15 than not sex traffickers, correct?  
16 **A. I decline to answer; Amendment 1 and 5.**  
17 Q. And neither you -- well, strike that.  
18 Management knew that as well, correct?  
19 **A. I decline to answer; Amendment 1 and 5.**  
20 Q. And neither you nor management did  
21 anything to stop those sex traffickers because you  
22 and management wanted to profit from their ads,  
23 correct?  
24 **A. I decline to answer; Amendment 1 and 5.**  
25 Q. As of January 2010, you knew that some

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1 users, whose -- whose ads depicted different people,  
2 were moving to different locations because of law  
3 enforcement, correct?  
4 **A. Could you repeat the question?**  
5 Q. As of January 2010, you knew that some  
6 users, who posted ads depicting different people,  
7 were moving to different locations because of law  
8 enforcement, correct?  
9 **A. I decline to answer; Amendment 1 and 5.**  
10 Q. And you knew that those users were more  
11 likely than not sex traffickers, correct?  
12 **A. I decline to answer; Amendment 1 and 5.**  
13 Q. Management knew that as well, correct?  
14 **A. I decline to answer; Amendment 1 and 5.**  
15 Q. Neither you nor management did anything to  
16 stop those sex traffickers from posting ads in the  
17 escort section because you and management wanted to  
18 profit from their ads, correct?  
19 **A. I decline to answer; Amendment 1 and 5.**  
20 Q. As of January 2010, you knew that  
21 Backpage.com's blog was being used to teach sex  
22 traffickers how to create ads that avoid detection  
23 by law enforcement, correct?  
24 **A. Could you repeat the question?**  
25 Q. As of January 2010, you knew that

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1 Backpage.com's blog was being used to teach sex  
2 traffickers how to create ads that avoid detection  
3 by law enforcement, correct?  
4 **A. I still don't understand the question. I**  
5 **don't know what that means.**  
6 MR. SCHNEIDER: Objection to the form.  
7 MR. HENZE: Join.  
8 Q. (BY MR. AMALA) Do you know what a blog is?  
9 **A. Oh, a blog. I'm sorry. I thought you**  
10 **said "log," and I just...**  
11 Q. All right. Fair. I'll -- I'll restate it  
12 again.  
13 As of January 2010, you knew that  
14 Backpage.com's blog was being used to teach sex  
15 traffickers how to create ads that avoid detection  
16 by law enforcement, correct?  
17 **A. I decline to answer; Amendment 1 and 5.**  
18 Q. Management of Backpage.com knew that as  
19 well, correct?  
20 **A. I decline to answer; Amendment 1 and 5.**  
21 Q. **As of January 2010, you were instructing**  
22 **sex traffickers how to create ads that avoid**  
23 **detection by law enforcement, correct?**  
24 **A. I decline to answer; Amendment 1 and 5.**  
25 **Q. And management knew that sex traffickers**

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1 were being instructed by people at Backpage.com on  
2 how to create ads that avoid detection by law  
3 enforcement, correct?

4 **A. I decline to answer; Amendment 1 and 5.**

5 Q. As of January 2010, you knew that the

6 Erotic Review was being used to drive sex  
7 trafficking to the website Backpage.com, correct?

8 **A. I decline to answer; Amendment 1 and 5.**

9 Q. And management of Backpage.com knew that  
10 as well, correct?

11 **A. I decline to answer; Amendment 1 and 5.**

12 Q. As of January 2010, you knew that the  
13 purported efforts by Backpage.com to help law  
14 enforcement stop -- stop sex trafficking was a sham,  
15 correct?

16 **A. I decline to answer; Amendment 1 and 5.**

17 Q. You had no real intention to help stop sex  
18 trafficking, correct?

19 **A. I decline to answer; Amendment 1 and 5.**

20 Q. And management of Backpage.com knew that  
21 the purported efforts by Backpage.com to help law  
22 enforcement stop sex trafficking was a sham,  
23 correct?

24 **A. I decline to answer; Amendment 1 and 5.**

25 Q. And the management of Backpage.com had no

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1 real intention to help stop sex trafficking,  
2 correct?

3 **A. I decline to answer; Amendment 1 and 5.**

4 Q. As of January 2010, you knew that  
5 Backpage.com's purported efforts to help The  
6 National Center for Missing & Exploited Children  
7 stop sex trafficking of children was a sham,  
8 correct?

9 **A. I decline to answer; Amendment 1 and 5.**

10 Q. You had no real goal of helping The  
11 National Center for Missing & Exploited Children  
12 stop sex trafficking of children on Backpage.com,  
13 correct?

14 **A. I decline to answer; Amendment 1 and 5.**

15 Q. Management of Backpage.com has never had  
16 any real intention to work with The National Center  
17 for Missing & Exploited Children to prevent sex  
18 trafficking of children on Backpage.com, correct?

19 **A. I decline to answer; Amendment 1 and 5.**

20 Q. You have intentionally destroyed records  
21 in order to try to avoid civil liability for what  
22 happened to the plaintiffs in this case, correct?

23 **A. I decline to answer; Amendment 1 and 5.**

24 Q. The management of Backpage.com has  
25 intentionally destroyed records in order to try to

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1 avoid civil liability for what happened to the  
2 plaintiffs in this case, correct?

3 **A. I decline to answer; Amendment 1 and 5.**

4 Q. Backpage.com has destroyed records that it  
5 possessed regarding the plaintiffs who were  
6 advertised for sex on Backpage.com, correct?

7 **A. I decline to answer; Amendment 1 and 5.**

8 Q. As of January 2010, you had had  
9 conversations with Jim Larkin and Mike Lacey  
10 regarding the fact that Backpage.com was the largest  
11 source of sex trafficking in the country, correct?

12 **A. I decline to answer; Amendment 1 and 5.**

13 Q. As of January 2010, you had had  
14 conversations with Jim Larkin and Mike Lacey  
15 regarding the fact that Backpage.com was  
16 intentionally promoting the website as a marketplace  
17 for sex trafficking, correct?

18 **A. I decline to answer; Amendment 1 and 5.**

19 Q. As of January 2010, you had had  
20 conversations with Jim Larkin and Mike Lacey  
21 regarding the fact that Backpage.com was generating  
22 millions of dollars in profits from sex trafficking  
23 in the escort section of the website Backpage.com,  
24 correct?

25 **A. I decline to answer; Amendment 1 and 5.**

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1 Q. As of January 2010, you had had  
2 discussions with Jim Larkin and Mike Lacey regarding  
3 the fact that Backpage.com was intentionally helping  
4 sex traffickers post illegal ads for sex in the  
5 escort section of the website Backpage.com, correct?

6 **A. I decline to answer; Amendment 1 and 5.**

7 Q. You had discussions with Jim Larkin and  
8 Mike Lacey regarding the fact that they were selling  
9 their interest in Backpage.com in order to try to  
10 avoid civil liability for sex trafficking, correct?

11 **A. I decline to answer; Amendment 1 and 5.**

12 Q. All right. You've had discussions with  
13 Jim Larkin and Mike Lacey about how you-all might be  
14 able to convince former employees of Backpage.com to  
15 resist helping law enforcement hold Backpage.com  
16 criminally accountable for what's happened in the  
17 escort section, correct?

18 **A. I decline to answer; Amendment 1 and 5.**

19 Q. All right. You've had conversations with  
20 Jim Larkin and Mike Lacey regarding the fact that  
21 they caused 5,000-dollar checks to be issued to  
22 various current and former employees who worked on  
23 Backpage.com in an effort to by their silence and  
24 loyalty in the face of mounting civil, criminal, and  
25 legislative efforts to hold them accountable for

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1 what they did in the escort section of Backpage.com,  
2 correct?

3 **A. I decline to answer; Amendment 1 and 5.**

4 Q. The management of Backpage.com sold the  
5 company to a Dutch company in order to try to avoid  
6 civil liability for sex trafficking, correct?

7 **A. I decline to answer; Amendment 5.**

8 Q. Management of Backpage.com sold the  
9 company to a Dutch company in order to try to avoid  
10 civil liability for the claims of the plaintiffs in  
11 this case, correct?

12 **A. I decline to answer; Amendment 5.**

13 Q. Management of Backpage.com sold the  
14 company to a Dutch company in order to try and to  
15 avoid criminal liability for sex trafficking,  
16 correct?

17 **A. I decline to answer; Amendment 5.**

18 Q. You know that the website,  
19 theeroticreview.com, is a website that has  
20 evaluations of women and children who have been  
21 trafficked in sex, correct?

22 **A. I decline to answer; Amendment 5.**

23 Q. As of January 2010, you were working with  
24 the owners of theeroticreview.com to help promote  
25 links from theeroticreview.com to Backpage.com so

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1 that Backpage.com could profit off of sex  
2 trafficking in the escort section of Backpage.com,  
3 correct?

4 **A. I decline to answer; Amendment one and  
5 Amendment 5.**

6 **(Deposition Exhibit 1 marked)**

7 Q. (BY MR. AMALA) Mr. Ferrer, I've handed you  
8 what's been marked as Exhibit 1.

9 THE VIDEOGRAPHER: Sir, can you put on  
10 your mic?

11 Q. (BY MR. AMALA) Mr. Ferrer, I've handed you  
12 what's been marked as Exhibit 1.

13 Please take a moment to review Exhibit 1  
14 and let me know when you're finished.

15 **A. Okay. I'm finished with the review.**

16 Q. Exhibit 1 is a true and accurate copy of  
17 an advertisement for sex that appeared of Plaintiff  
18 L.C. in the escort section of Backpage.com, correct?

19 **A. Is this all Exhibit 1?**

20 Q. Yes, sir.

21 **A. I decline to answer; Amendment 1 and  
22 Amendment 5.**

23 Q. All right. You saw this ad regarding L.C.  
24 before it was posted on Backpage.com, correct?

25 **A. I decline to answer; Amendment 1 and**

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1 **Amendment 5.**

2 Q. An ad moderator working for Backpage.com  
3 saw this ad before it was posted in the escort  
4 section of Backpage.com, correct?

5 **A. I decline to answer; Amendment 1 and  
6 Amendment 5.**

7 Q. You edited the content of this ad  
8 regarding Plaintiff L.C. before it was posted on  
9 Backpage.com, correct?

10 **A. I decline to answer; Amendment 1 and  
11 Amendment 5.**

12 Q. A moderator working for Backpage.com  
13 edited the content of this ad regarding Plaintiff  
14 L.C. before it was posted in the escort section of  
15 Backpage.com, correct?

16 **A. I decline to answer; Amendment 1 and  
17 Amendment 5.**

18 Q. You edited this -- the content of this ad  
19 regarding Plaintiff L.C. before it was passed --  
20 posted on Backpage.com in order to make it less  
21 clear that it is an ad for paid sex, correct?

22 **A. I decline to answer; Amendment 1 and  
23 Amendment 5.**

24 Q. A moderator working for Backpage.com  
25 edited the content of this ad before it was posted

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1 in the escort section of Backpage.com in order to  
2 make it less clear that this is an advertisement for  
3 paid sex, correct?

4 **A. I decline to answer; Amendment 1 and  
5 Amendment 5.**

6 Q. When this ad was posted, you knew that  
7 this was an ad of Plaintiff L.C. for paid sex even  
8 though she was an underaged girl, correct?

9 **A. I decline to answer; Amendment 1 and  
10 Amendment 5.**

11 Q. Backpage.com knew that as well, correct?

12 **A. I decline to answer; Amendment 1 and  
13 Amendment 5.**

14 Q. At the time this ad regarding Plaintiff  
15 L.C. was posted in the escort section of  
16 Backpage.com, you knew that the person who posted  
17 the ad had a history of trafficking women and  
18 children for paid sex on Backpage.com, correct?

19 **A. I decline to answer; Amendment 1 and  
20 Amendment 5.**

21 Q. Backpage.com knew that as well, correct?

22 **A. I decline to answer; Amendment 1 and  
23 Amendment 5.**

24 Q. The moderator who was working for  
25 Backpage.com who reviewed this ad before it was

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1 posted knew that the person who posted the ad had a  
2 history of trafficking women and children for paid  
3 sex on Backpage.com, correct?

4 **A. I decline to answer; Amendment 1 and  
5 Amendment 5.**

6 Q. You allowed that person to continue  
7 trafficking women and children for sex on  
8 Backpage.com because you wanted to profit off a  
9 person's ads for sex, correct?

10 **A. I decline to answer; Amendment 1 and  
11 Amendment 5.**

12 Q. The management of Backpage.com allowed  
13 that to happen because they wanted to continue  
14 profiting from such ads as well, correct?

15 **A. I decline to answer; Amendment 1 and  
16 Amendment 5.**

17 Q. At the time this ad regarding Plaintiff  
18 L.C. was posted in the escort section of  
19 Backpage.com, Backpage.com knew that L.C. was likely  
20 being forced to have sex with dozens of men each day  
21 because of the ads being posted regarding her on  
22 Backpage.com, correct?

23 **A. I decline to answer; Amendment 1 and 5.**

24 Q. You edited each of the ads that were  
25 posted on Backpage.com regarding Plaintiff L.C. in

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1 order to make it less obvious that the ads were for  
2 paid sex, correct?

3 **A. I decline to answer; Amendment 1 and 5.**

4 Q. A moderator working for Backpage.com  
5 edited each of the ads that were posted in the  
6 escort section of Backpage.com regarding Plaintiff  
7 L.C. in order to make the ads less obvious that they  
8 were for paid sex, correct?

9 **A. I decline to answer; Amendment 1 and 5.**

10 Q. Okay. You knew that each of the ads that  
11 were posted in the escort section of Backpage.com  
12 regarding Plaintiff L.C. was an ad for paid sex,  
13 correct?

14 **A. I decline to answer; Amendment 1 and 5.**

15 Q. Management of Backpage.com knew that as  
16 well, correct?

17 **A. I decline to answer; Amendment 1 and 5.**

18 Q. At the time the ads regarding Plaintiff  
19 L.C. were posted in the escort section of  
20 Backpage.com, you knew that L.C. was a minor,  
21 correct?

22 **A. I decline to answer; Amendment 1 and 5.**

23 Q. Okay. At the time the ads regarding  
24 Plaintiff L.C. were posted in the escort section of  
25 Backpage.com, the moderators who reviewed each of

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1 her ads knew that she was underage, correct?

2 **A. I decline to answer; Amendment 1 and 5.**

3 Q. Backpage.com profited from each of the ads  
4 regarding Plaintiff L.C. that were posted in the  
5 escort section of Backpage.com, correct?

6 **A. I decline to answer; Amendment 1 and 5.**

7 Q. As of January 2010, you were instructing  
8 the moderators who were reviewing and revising the  
9 ads in the escort section of Backpage.com to delete  
10 any images showing the person in the ad performing  
11 sexual acts but then to publish the remainder of the  
12 ad, correct?

13 **A. I decline to answer; Amendment 1 and 5.**

14 Q. And the management at Backpage.com knew  
15 that was occurring as well, correct?

16 **A. I decline to answer; Amendment 1 and 5.**

17 Q. You instructed those revisions to be made  
18 because you wanted to conceal the fact that the ads  
19 were for paid sex, correct?

20 **A. I decline to answer; Amendment 1 and 5.**

21 Q. And that was the goal of the management of  
22 Backpage.com as well, correct?

23 **A. I decline to answer; Amendment 1 and 5.**

24 Q. And you and the management of Backpage.com  
25 wanted to continue profiting from such ads, correct?

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1 **A. I decline to answer; Amendment 1 and 5.**

2 Q. In 2010, Backpage.com contracted with a  
3 sex trafficker named Baruti Hopson to advertise  
4 Plaintiff J.S. for sex on Backpage.com over a  
5 hundred times, correct?

6 **A. I decline to answer; Amendment 1 and 5.**

7 Q. At the time, you knew that Baruti Hopson  
8 was advertising women and children for sex in the  
9 escort section of Backpage.com, correct?

10 **A. I decline to answer; Amendment 1 and 5.**

11 Q. And management of Backpage.com knew that  
12 as well, correct?

13 **A. I decline to answer; Amendment 1 and 5.**

14 Q. At the time that Mr. Hopson was posting  
15 ads for sex regarding J.S. in the escort section of  
16 Backpage.com, you knew that J.S. was a minor child,  
17 correct?

18 **A. I decline to answer; Amendment 1 and 5.**

19 Q. And the management of Backpage.com knew  
20 that as well, correct?

21 **A. I decline to answer; Amendment 1 and 5.**

22 Q. The fact that J.S. was a minor child was  
23 obvious from the pictures that were posted of her in  
24 the ads in the escort section of Backpage.com,  
25 correct?

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1 **A. I decline to answer; Amendment 1 and 5.**  
2 Q. At the time that Mr. Hopson was posting  
3 ads regarding Plaintiff J.S. in the escort section  
4 of Backpage.com, you knew that Mr. Hopson was a sex  
5 trafficker, correct?  
6 **A. I decline to answer; Amendment 1 and 5.**  
7 Q. Management knew that as well, correct?  
8 **A. I decline to answer; Amendment 1 and 5.**  
9 Q. And the moderators who were working for  
10 Backpage.com, who reviewed the ads that were being  
11 posted by Mr. Hopson regarding Plaintiff J.S., knew  
12 that Mr. Hopson was a sex trafficker, correct?  
13 **A. I decline to answer; Amendment 1 and 5.**  
14 Q. All right. You edited the content of each  
15 of the ads that were posted regarding Plaintiff J.S.  
16 in the escort section of Backpage.com, correct?  
17 **A. I decline to answer; Amendment 1 and 5.**  
18 Q. A moderator who was working for  
19 Backpage.com reviewed and edited the content of each  
20 of the ads regarding Plaintiff J.S. that was posted  
21 in the escort section of the website Backpage.com,  
22 correct?  
23 **A. I decline to answer; Amendment 1 and 5.**  
24 Q. All right. You and the moderators working  
25 for Backpage.com edited the content of the ads

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1 regarding Plaintiff J.S. to make it less obvious  
2 that the ads were ads for paid sex, correct?  
3 **A. I decline to answer; Amendment 1 and 5.**  
4 Q. And you did that because you wanted to  
5 profit from the ads that were being posted in the  
6 escort section of Backpage.com regarding Plaintiff  
7 J.S., correct?  
8 **A. I decline to answer; Amendment 1 and 5.**  
9 Q. You never took any steps to try to prevent  
10 J.S. from being advertised for sex in the escort  
11 section of Backpage.com, correct?  
12 **A. I decline to answer; Amendment 1 and 5.**  
13 Q. You profited from each of the ads  
14 regarding Plaintiff L.C. that were posted on  
15 Backpage.com, correct?  
16 **A. I decline to answer; Amendment 1 and 5.**  
17 Q. And Backpage.com profited from each of the  
18 ads that were posted regarding Plaintiff L.C. in the  
19 escort section of Backpage.com, correct?  
20 **A. I decline to answer; Amendment 1 and 5.**  
21 **(Deposition Exhibit 2 marked)**  
22 Q. (BY MR. AMALA) All right. Mr. Ferrer,  
23 I've handed you what's been marked as Exhibit 2.  
24 Please take a moment to review Exhibit 2  
25 and let me know when you're finished.

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1 **A. I've finished my review.**  
2 Q. Mr. Ferrer, this is an advertisement for  
3 paid sex that was posted on Backpage.com, regarding  
4 Plaintiff L.C., correct?  
5 MR. HENZE: Object to the form of the  
6 question.  
7 **A. I decline to answer; Amendment 1 and**  
8 **Amendment 5.**  
9 Q. (BY MR. AMALA) All right. Mr. Ferrer, do  
10 you know if Exhibit 2 is an advertisement for paid  
11 sex that was posted on Backpage.com regarding  
12 Plaintiff L.C.?  
13 **A. I decline to answer; Amendment 1 and 5.**  
14 Q. Make sure I didn't confuse my exhibit  
15 numbers earlier.  
16 Exhibit 2 is an ad for paid sex that was  
17 posted on Backpage.com regarding Plaintiff L.C.,  
18 correct?  
19 **A. I decline to answer; Amendment 1 and**  
20 **Amendment 5.**  
21 Q. You edited this ad regarding Plaintiff  
22 L.C. before it was posted on Backpage.com, correct?  
23 **A. I decline to answer; Amendment 1 and**  
24 **Amendment 5.**  
25 Q. A moderator working for Backpage.com

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1 reviewed and revised the content of this  
2 advertisement regarding Plaintiff L.C. before it was  
3 posted on Backpage.com, correct?  
4 **A. I decline to answer; Amendment 1 and**  
5 **Amendment 5.**  
6 Q. In 2010 Backpage.com contracted with one  
7 or more sex traffickers to advertise Plaintiff S.L.  
8 for sex in the escort section of Backpage.com,  
9 correct?  
10 **A. I decline to answer; Amendment 1 and**  
11 **Amendment 5.**  
12 Q. At the time the Plaintiff L. [sic] S.L.  
13 was advertised for sex in the escort section of  
14 Backpage.com, you knew that she was a minor child,  
15 correct?  
16 **A. I decline to answer; Amendment 1 and**  
17 **Amendment 5.**  
18 Q. The management of Backpage.com knew that  
19 S.L. was a minor as well, correct?  
20 **A. I decline to answer; Amendment 1 and**  
21 **Amendment 5.**  
22 Q. And the moderator, who reviewed and  
23 revised the content of the ads posted on  
24 Backpage.com regarding S.L., knew that she was a  
25 minor, correct?

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1 **A. I decline to answer; Amendment 1 and**  
2 **Amendment 5.**  
3 **Q. The fact that S.L. was a minor at the time**  
4 **was obvious from the pictures that were posted of --**  
5 **of her in the ads that appeared on Backpage.com,**  
6 **correct?**  
7 **A. I decline to answer; Amendment 1 and**  
8 **Amendment 5.**  
9 **Q. At the time the ads regarding S.L. were**  
10 **posted on Backpage.com, you knew that the people who**  
11 **were posting the ads of her were sex traffickers,**  
12 **correct?**  
13 **A. I decline to answer; Amendment 1 and**  
14 **Amendment 5.**  
15 **Q. And management at Backpage.com knew that**  
16 **as well, correct?**  
17 **A. I decline to answer; Amendment 1 and**  
18 **Amendment 5.**  
19 **Q. And the moderators who reviewed and**  
20 **revised the ads regarding S.L. that were posted on**  
21 **Backpage.com knew that as well, correct?**  
22 **A. I decline to answer; Amendment 1 and**  
23 **Amendment 5.**  
24 **Q. At the time you knew that S.L. was more**  
25 **likely than not being forced to have sex with dozens**

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1 **prevent Plaintiff S.L. from being advertised for sex**  
2 **in the escort section of Backpage.com, correct?**  
3 **A. I decline to answer; Amendment 1 and**  
4 **Amendment 5.**  
5 **Q. Okay. Nobody working for Backpage.com**  
6 **took any steps to help prevent Plaintiff S.L. from**  
7 **being advertised for sex but -- in the escort**  
8 **section of Backpage.com, correct?**  
9 **A. I decline to answer; Amendment 1 and**  
10 **Amendment 5.**  
11 **MR. AMALA: Let's take a break.**  
12 **And just so you know, I don't have --**  
13 **famous last words, but I don't have much left.**  
14 **So...**  
15 **THE VIDEOGRAPHER: The time is 11:18.**  
16 **MR. AMALA: I said, "Famous last words,**  
17 **but I don't have much left." So...**  
18 **THE VIDEOGRAPHER: We are off the record.**  
19 **(Deposition Exhibit 3 marked)**  
20 **(Recess from 11:18 to 11:35)**  
21 **THE VIDEOGRAPHER: And we are on the**  
22 **record. The time is 11:35.**  
23 **Q. (BY MR. AMALA) Mr. Ferrer, I've handed you**  
24 **what's been marked as Exhibit 3.**  
25 **Please take a moment to review Exhibit 3**

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1 **of men because of the ads being posted of her in the**  
2 **escort section of Backpage.com, correct?**  
3 **A. I decline to answer; Amendment 1 and**  
4 **Amendment 5.**  
5 **Q. The management of Backpage.com knew that**  
6 **as well, correct?**  
7 **A. I decline to answer; Amendment 1 and**  
8 **Amendment 5.**  
9 **Q. And the moderators who reviewed and**  
10 **revised the ads posted regarding S.L. on**  
11 **Backpage.com knew that as well, correct?**  
12 **A. I decline to answer; Amendment 1 and**  
13 **Amendment 5.**  
14 **Q. You revised the content of each of the ads**  
15 **that were posted on Backpage.com regarding Plaintiff**  
16 **S.L., correct?**  
17 **A. I decline to answer; Amendment 1 and**  
18 **Amendment 5.**  
19 **Q. A moderator working for Backpage.com**  
20 **reviewed and revised each of the ads that were**  
21 **posted in the escort section of Backpage.com**  
22 **regarding Plaintiff S.L., correct?**  
23 **A. I decline to answer; Amendment 1 and**  
24 **Amendment 5.**  
25 **Q. Okay. You didn't take any steps to help**

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1 **and let me know when you're finished.**  
2 **A. Okay. I've finished my review.**  
3 **Q. All right. Exhibit 3 is the advertisement**  
4 **for sex that was posted in the escort section of**  
5 **Backpage.com regarding Plaintiff S.L., correct?**  
6 **A. I decline to answer; Amendment 1 and**  
7 **Amendment 5.**  
8 **Q. In 2010 Backpage.com contracted with one**  
9 **or more sex traffickers to advertise Plaintiff S.L.**  
10 **for sex in the escort section of Backpage.com,**  
11 **correct?**  
12 **A. I decline to answer; Amendment 1 and**  
13 **Amendment 5.**  
14 **Q. At the time that ads for sex regarding**  
15 **Plaintiff S.L. were posted in the escort section of**  
16 **Backpage.com, you knew that S.L. was a minor child,**  
17 **correct?**  
18 **A. I decline to answer; Amendment 1 and**  
19 **Amendment 5.**  
20 **Q. The management of Backpage.com knew that**  
21 **S.L. was a minor child as well, correct?**  
22 **A. I decline to answer; Amendment 1 and**  
23 **Amendment 5.**  
24 **Q. And the moderators working for**  
25 **Backpage.com, who reviews -- reviewed and revised**

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1 the ads posted on Backpage.com regarding S.L. knew  
2 that she was a minor child as well, correct?  
3 **A. I decline to answer; Amendment 1 and**  
4 **Amendment 5.**  
5 **Q. You edited the content of each of the ads**  
6 **that were posted in the escort section of**  
7 **Backpage.com regarding Plaintiff S.L., correct?**  
8 **A. I decline to answer; Amendment 1 and**  
9 **Amendment 5.**  
10 **Q. A moderator working for Backpage.com**  
11 **reviewed and revised each of the ads that were**  
12 **posted in the escort section of Backpage.com**  
13 **regarding Plaintiff S.L., correct?**  
14 **A. I decline to -- pardon me, I'm losing my**  
15 **voice.**  
16 **I decline to answer; Amendment 1 and**  
17 **Amendment 5.**  
18 **Q. The fact that S.L. was a minor was obvious**  
19 **from the pictures that were posted in her ads,**  
20 **correct?**  
21 **A. I decline to answer; Amendment 1 and**  
22 **Amendment 5.**  
23 **Q. At the time that the ads for sex regarding**  
24 **Plaintiff S.L. were posted in the escort section of**  
25 **Backpage.com, you knew that the people who were**

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1 posting those ads were sex traffickers, correct?  
2 **A. I decline to answer; Amendment 1 and**  
3 **Amendment 5.**  
4 **Q. The management of Backpage.com knew that**  
5 **as well, correct?**  
6 **A. I decline to answer; Amendment 1 and**  
7 **Amendment 5.**  
8 **Q. And the moderators who reviewed and**  
9 **revised the ads that were posted on Backpage.com**  
10 **regarding Plaintiff S.L. knew that the people**  
11 **posting those ads were sex traffickers, correct?**  
12 **A. I decline to answer; Amendment 1 and**  
13 **Amendment 5.**  
14 **Q. At the time that the ads regarding**  
15 **Plaintiff S.L. were posted in the escort section of**  
16 **Backpage.com, you knew that S.L. was more likely**  
17 **than not being forced to have sex with dozens of men**  
18 **because of those ads, correct?**  
19 **A. I decline to answer; Amendment 1 and**  
20 **Amendment 5.**  
21 **Q. The management of Backpage.com knew that**  
22 **as well, correct?**  
23 **A. I decline to answer; Amendment 1 and**  
24 **Amendment 5.**  
25 **Q. And the moderators who reviewed and**

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1 revised the ads regarding S.L. that were posted on  
2 Backpage.com knew that as well, correct?  
3 **A. I decline to answer; Amendment 1 and**  
4 **Amendment 5.**  
5 **Q. You profited from each of the ads that**  
6 **were posted on Backpage.com regarding Plaintiff**  
7 **S.L., correct?**  
8 **A. I decline to answer; Amendment 1 and 5.**  
9 **Q. Backpage.com profited from each of the ads**  
10 **that were posted in the escort of -- section of**  
11 **Backpage.com regarding Plaintiff S.L., correct?**  
12 **A. I decline to answer; Amendment 1 and 5.**  
13 **Q. You didn't take any steps to prevent**  
14 **Plaintiff S.L. from being trafficked for sex in the**  
15 **escort section of Backpage.com, correct?**  
16 **A. I decline to answer; Amendment 1 and 5.**  
17 **Q. Nobody from Backpage.com helped to prevent**  
18 **Plaintiff S.L. from being trafficked for sex in the**  
19 **escort section of Backpage.com, correct?**  
20 **A. I decline to answer; Amendment 1 and 5.**  
21 **Q. You did not ask anyone who was posting ads**  
22 **in the escort section of Backpage.com, regarding any**  
23 **of the plaintiffs, for photo identification to prove**  
24 **that the plaintiffs were over the age of 18,**  
25 **correct?**

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1 **A. Could you repeat the question?**  
2 **Q. You did not ask the people who were**  
3 **posting ads regarding each of the plaintiffs on**  
4 **Backpage.com for a photo identification to prove**  
5 **that each of the plaintiffs was over 18, correct?**  
6 **A. I decline to answer; Amendment 1 and 5.**  
7 **Q. Nobody associated with Backpage.com asked**  
8 **for photo identification to prove that the**  
9 **plaintiffs were actually over the age of 18,**  
10 **correct?**  
11 **A. I decline to answer; Amendment 1 and 5.**  
12 **Q. If the ads regarding the plaintiffs had**  
13 **been published in traditional print media, the**  
14 **policies of Village Voice Media would have required**  
15 **that the people buying the ads provided a photo**  
16 **identification to prove that the plaintiffs were**  
17 **over the age -- age of 18, correct?**  
18 **MR. HENZE: Objection, foundation.**  
19 **MR. SCHNEIDER: Join -- excuse me.**  
20 **Objection, form.**  
21 **MR. HENZE: Yeah, form.**  
22 **A. I decline to answer; Amendment 1 and 5.**  
23 **Q. (BY MR. AMALA) Do you know whether -- at**  
24 **the time each of the plaintiffs were advertised for**  
25 **sex in the escort section of Backpage.com -- whether**

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1 or not Village Voice had policies regarding whether  
2 or not photo identification was required for ads  
3 regarding adult services that were published in  
4 their print media?  
5 **A. I decline to answer; Amendment 1 and 5.**  
6 Q. You knew that -- strike that.  
7 You knew that each of the ads regarding  
8 the plaintiffs were posted in the escort section of  
9 Backpage.com, correct?  
10 **A. I decline to answer; Amendment 1 and 5.**  
11 Q. And you knew that by using the word  
12 "escort" for the section of the website where those  
13 ads were placed, people who wanted to purchase paid  
14 sex would know that these girls were available for  
15 paid sex, correct?  
16 **A. I decline to answer; Amendment 1 and 5.**  
17 Q. Management of Backpage.com knew that as  
18 well, correct?  
19 **A. I decline to answer; Amendment 1 and 5.**  
20 Q. You chose the word "escort" to be used on  
21 Backpage.com to identify every person posted in the  
22 escort section as someone who is available for sex  
23 for money, correct?  
24 **A. Could you repeat the question?**  
25 Q. You chose the word "escort" to be used on

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1 **A. I decline to answer; Amendment 1 and 5.**  
2 Q. You chose to use the word "escort" on  
3 Backpage.com as a way to make a material difference  
4 to people who were visiting the website so that they  
5 would know that people who appeared in the escort  
6 section of the website were available for sex for  
7 money, correct?  
8 **A. I decline to answer; Amendment 1 and 5.**  
9 Q. And the management of Backpage.com knew  
10 that the term "escort" had been selected for that  
11 reason, correct?  
12 **A. I decline to answer; Amendment 1 and 5.**  
13 Q. And that was true as of January 2010,  
14 correct?  
15 **A. I decline to answer; Amendment 1 and 5.**  
16 Q. The term "escort" appeared on every ad  
17 that appeared on Backpage.com regarding each of the  
18 plaintiffs, correct?  
19 **A. I decline to answer; Amendment 1 and 5.**  
20 Q. And that was a term that was provided by  
21 Backpage.com, correct?  
22 **A. I decline to answer; Amendment 1 and 5.**  
23 Q. And Backpage.com included that term so  
24 that people who wanted to buy sex for money knew  
25 that all of the plaintiffs were available for sex

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1 Backpage.com in order to identify every person  
2 posted in the escort section as someone who is  
3 available for sex for money, correct?  
4 **A. I decline to answer the question;**  
5 **Amendment 1 and 5.**  
6 Q. And the management at Backpage.com knew  
7 that the word "escort" had been selected to be used  
8 on the website Backpage.com to identify every person  
9 who appeared in the escort section of the website as  
10 someone who is available for sex for money, correct?  
11 **A. I decline to answer; Amendment 1 and 5.**  
12 Q. You chose the term "escort" because it is  
13 common knowledge in the world of sex trafficking  
14 that "escort" means prostitute, correct?  
15 MR. HENZE: Form. Objection, form.  
16 **A. I decline to answer; Amendment 1 and 5.**  
17 Q. (BY MR. AMALA) And you knew that by using  
18 the term "escort," that term would be used as an  
19 identifier to make a material difference in the  
20 meaning of the ads posted by others regarding --  
21 well, strike that.  
22 You knew that by using the term "escort,"  
23 you were identifying women posted in the escort  
24 section of Backpage.com as being people who were  
25 available for sex for money, correct?

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1 for money, correct?  
2 **A. I decline to answer; Amendment 1 and 5.**  
3 Q. By using the term "escort," you knew that  
4 the minor plaintiffs would be represented to people  
5 who wanted to buy sex for money as prostitutes who  
6 could be pot -- who could be bought, correct?  
7 **A. Could you repeat the question?**  
8 Q. Sure. You knew that by using the term  
9 "escorts," the minor plaintiffs who appeared on  
10 Backpage.com would be advertised to johns as  
11 available for sex for money, correct?  
12 **A. I decline to answer; Amendment 1 and 5.**  
13 Q. By using the term "escort," you were  
14 indicating to potential customers that each of the  
15 plaintiffs was a prostitute who would provide sex  
16 for money, correct?  
17 **A. I decline to answer; Amendment 1 and**  
18 **Amendment 5.**  
19 Q. You knew that without the word "escort"  
20 appearing in the ads of the plaintiffs, people who  
21 viewed the ads might not understand that the  
22 plaintiffs were available for sex for money,  
23 correct?  
24 **A. Amendment I decline to answer; Amendment 1**  
25 **and 5.**

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1 Q. As of January 2010, you knew that the logo  
2 of Backpage.com that appeared on the advertisement  
3 for each of the minor plaintiffs was an indication  
4 that the minor plaintiffs were available for sex for  
5 money, correct?

6 **A. Could you state that question again?**

7 Q. Sure.

8 MR. AMALA: Can you read that one back?

9 THE REPORTER: QUESTION: "As of January  
10 2010, you knew that the logo of Backpage.com that  
11 appeared on the advertisement for each of the minor  
12 plaintiffs was an indication that the minor  
13 plaintiffs were available for sex for money,  
14 correct?"

15 **A. I decline to answer; Amendment 1 and 5.**

16 Q. (BY MR. AMALA) Backpage.com was  
17 responsible for placing that logo on each of the  
18 plaintiffs' ads, correct?

19 **A. I decline to answer; Amendment 1 and 5.**

20 Q. By putting the Backpage.com logo and name  
21 on each escort ad of the plaintiffs, you were  
22 effectively branding each ad as a prostitution  
23 advertisement, correct?

24 **A. I decline to answer; Amendment 1 and 5.**

25 Q. If you could, turn back to Exhibit 1,

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1 please.

2 You knew that this advertisement,  
3 Plaintiff L.C., was an ad for paid sex, because it  
4 includes the terms "cum" spelled, C-U-M, and  
5 "quickie" spelled, Q-U-I-C-K-I-E, correct?

6 **A. I decline to answer; Amendment 1 and 5.**

7 Q. The moderator who was working for  
8 Backpage.com who reviewed and revised this ad would  
9 have removed the terms "cum," C-U-M and "quickie,"  
10 Q-U-I-C-K-I-E, in order to make the ad less obvious  
11 that it was an ad for sex, correct?

12 MR. SCHNEIDER: Can I have that read back,  
13 please?

14 THE REPORTER: Yes.

15 MR. HENZE: Mr. Amala, where's the word  
16 "quickie"?

17 MR. AMALA: It's the very last page.

18 MR. HENZE: Pardon me?

19 MR. AMALA: I believe it's on the very  
20 last page.

21 MR. HENZE: On the last page.

22 THE REPORTER: Do you want me to read it  
23 back?

24 MR. AMALA: Yes, please.

25 THE REPORTER: QUESTION: "The moderator

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1 who was working for Backpage.com who reviewed and  
2 revised this ad would have removed the terms "cum,"  
3 C-U-M and "quickie," Q-U-I-C-K-I-E, in order to make  
4 the ad less obvious that it was an ad for sex,  
5 correct?"

6 MR. SCHNEIDER: Object to form.

7 **A. I decline to answer your question;  
8 Amendment 1 and 5.**

9 Q. (BY MR. AMALA) And then the moderator  
10 would have posted the ad without those terms in  
11 order to conceal the fact that Plaintiff L.C. was  
12 being advertised for paid sex, correct?

13 **A. I decline to answer; Amendment 1 and 5.**

14 Q. And this was done by Backpage.com to help  
15 the sex trafficker who submitted this ad avoid law  
16 enforcement detection, correct?

17 **A. I declined the answer; Amendment 1 and 5.**

18 Q. Mr. Ferrer, you personally worked with sex  
19 traffickers to help them post advertisements for sex  
20 in the escort section of Backpage.com, correct?

21 **A. I decline to answer your question;  
22 Amendment 1 and 5.**

23 Q. You occasionally would receive emails from  
24 sex traffickers who were frustrated that their sex  
25 ads on Backpage.com were not being published,

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1 correct?

2 **A. I decline to answer; Amendment 1 and 5.**

3 Q. And when you received those  
4 communications, you went out of your way to then  
5 help those sex traffickers get their sex ads posted  
6 in the escort section of Backpage.com, correct?

7 **A. I decline to answer; Amendment 1 and 5.**

8 Q. Some of the sex traffickers who posted sex  
9 ads in the escort section of Backpage.com paid the  
10 company tens of thousands of dollars to post their  
11 advertisements, correct?

12 **A. I decline to answer; Amendment 1 and 5.**

13 MR. AMALA: Let's go off the record for  
14 one minute.

15 THE VIDEOGRAPHER: The time is 11:55. We  
16 are off the record.

17 (Recess from 11:55 to 12:03)

18 THE VIDEOGRAPHER: We are on the record.  
19 It's 12:03 p.m.

20 Q. (BY MR. AMALA) The purpose of the posting  
21 rules that were implemented for the escort section  
22 of Backpage.com were intended to help sex  
23 traffickers develop their ads for sex, correct?

24 **A. I decline to answer; Amendment 1 and 5.**

25 Q. And more specifically the purpose of the

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1 posting rules was to help sex traffickers develop  
 2 their ads for sex in a way that would reduce the  
 3 attention of law enforcement, correct?  
 4 **A. I decline to answer; Amendment 1 and**  
 5 **Amendment 5.**  
 6 Q. The purpose of the content requirements  
 7 that were implemented for ads posted in the escort  
 8 section of Backpage.com was to help sex traffickers  
 9 develop their sex ads in a way that would avoid  
 10 detection by law enforcement, correct?  
 11 MR. HENZE: Objection to the form.  
 12 Q. (BY MR. AMALA) Go ahead.  
 13 **A. I decline to answer; Amendment 1 and**  
 14 **Amendment 5.**  
 15 Q. The purpose of having moderators review  
 16 and revise ads that were posted in the escort  
 17 section of Backpage.com was to help sex traffickers  
 18 develop their sex ads in a way that would avoid  
 19 detection by law enforcement, correct?  
 20 **A. I decline to answer; Amendment 1 and**  
 21 **Amendment 5.**  
 22 Q. The purpose of using -- well, strike that.  
 23 The purpose of having the Backpage.com  
 24 logo and the term "escort" appear on each of the ads  
 25 that appeared in the escort section of Backpage.com

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1 was to help sex traffickers develop their sex ads in  
 2 a way that would help avoid detection by law  
 3 enforcement, correct?  
 4 MR. HENZE: Objection, to the form.  
 5 **A. I decline to answer; Amendment 1 and**  
 6 **Amendment 5.**  
 7 MR. AMALA: I don't have any further  
 8 questions for you. Thank you.  
 9 THE WITNESS: Thank you.  
 10 THE VIDEOGRAPHER: Before quitting the --  
 11 this is the end of the deposition of Carl Ferrer.  
 12 And the court reporter will now take the  
 13 orders of the transcript.  
 14 THE REPORTER: Okay. Please, state your  
 15 order.  
 16 MR. AMALA: Electronic copy, please, with  
 17 PDFs and the exhibits.  
 18 MR. SCHNEIDER: Are you going to spring  
 19 for your own copy, Mr. Bauer?  
 20 You're on the record.  
 21 You want to swear the witness?  
 22 (Laughter).  
 23 THE REPORTER: No, sir.  
 24 MR. SCHNEIDER: I'll take the electronic  
 25 copy as well.

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1 THE REPORTER: Okay.  
 2 MR. SCHNEIDER: That's probably it.  
 3 MR. AMALA: And then, Mr. Ferrer, has --  
 4 THE VIDEOGRAPHER: Are we off the record?  
 5 THE REPORTER: Signature?  
 6 MR. SCHNEIDER: No. We do not waive --  
 7 MR. AMALA: Oh, let's finish -- oh, yeah.  
 8 THE VIDEOGRAPHER: Are you done?  
 9 THE REPORTER: Well, I didn't get the  
 10 requirements about the signature on the record.  
 11 You said, "we don't" ...  
 12 MR. SCHNEIDER: As Counsel of a party to  
 13 the lawsuit, we do not waive the witness' right to  
 14 have a reading of this before signing it.  
 15 THE REPORTER: Thank you.  
 16 THE VIDEOGRAPHER: Are you done?  
 17 THE REPORTER: Yes.  
 18 THE VIDEOGRAPHER: The time is now 12:07  
 19 p.m.  
 20 And we are off the record.  
 21 (Proceedings concluded at 12:07 p.m.)  
 22  
 23  
 24  
 25

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1 CERTIFICATE OF VIDEOGRAPHER  
 2  
 3 I the undersigned, Scott Burke, am a videographer  
 4 on behalf of NAEGELI DEPOSITION AND TRIAL. I do  
 5 hereby certify that I have accurately made the video  
 6 recording of the deposition of Carl Ferrer, in the above  
 7 captioned matter on the 6th day of December, 2016, taken  
 8 at the location of Perkins Coie, 500 North Akard Street,  
 9 Suite 3300, Dallas, Texas 75201 consisting of 1 DVD.  
 10  
 11 No alterations, additions or deletions were made  
 12 thereto.  
 13  
 14 I further certify that I am not related to any of the  
 15 parties in the action and have no financial interest in the  
 16 outcome of this matter.  
 17  
 18  
 19 Scott Burke  
 20 Videographer  
 21  
 22  
 23  
 24  
 25

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1 CERTIFICATE

2  
3 I, Suzanne Kelly, do hereby certify that I reported all  
4 proceedings adduced in the foregoing matter and that the  
5 foregoing transcript pages constitutes a full, true,  
6 and accurate record of said proceedings to the best of  
7 my ability.

8  
9 I further certify that I am neither related to  
10 counsel or any part to the proceedings nor have any  
11 interest in the outcome of the proceedings.

12  
13 IN WITNESS HEREOF, I have hereunto set my hand this  
14 12th day of December, 2016.

15  
16  
17  
18  
19  
20 /S/ Suzanne Kelly

1 Date: December 16, 2016 Assignment #: 22735-1

2 Attorney: Harry J. Schneider, Jr., Esquire

3 Deponent: Carl Ferrer

4 Case: J.S, S.L., L.C. vs Village Voice

5  
6 ATTORNEY - TRANSCRIPT ENCLOSED: Signature of your client  
7 is required. Please have your client make any corrections  
8 necessary. Sign the Correction Sheet where indicated.  
9 Forward a COPY of the executed Correction Sheet directly  
10 to the attorney(s) listed below. (The Address(es) can be  
11 found on the Appearance page of the deposition.) Also,  
12 send a COPY of the executed Correction Sheet to our  
13 corporation.

14  
15  
16  
17  
18  
19  
20  
21  
22 CC: Naegeli Deposition & Trial  
23 Jason P. Amaml, Esquire  
24 Vincent T. Nappo, Esquire

1 CORRECTION SHEET

2 Deposition of: Carl Ferrer Date: 12/06/16  
3 Regarding: J.S, S.L., L.C. vs Village Voice  
4 Reporter: Kelly

5 \_\_\_\_\_  
6 Please make all corrections, changes or clarifications  
7 to your testimony on this sheet, showing page and line  
8 number. If there are no changes, write "none" across  
9 the page. Sign this sheet on the line provided.

10 Page Line Reason for Change

11 \_\_\_\_\_  
12 \_\_\_\_\_  
13 \_\_\_\_\_  
14 \_\_\_\_\_  
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16 \_\_\_\_\_  
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20 \_\_\_\_\_  
21 \_\_\_\_\_  
22 \_\_\_\_\_  
23 \_\_\_\_\_

24 Signature \_\_\_\_\_

25 Carl Ferrer

1 DECLARATION

2 Deposition of: Carl Ferrer Date: 12/06/16  
3 Regarding: J.S, S.L., L.C. vs Village Voice  
4 Reporter: Kelly

5 \_\_\_\_\_  
6  
7 I declare under penalty of perjury the following to  
8 be true:

9  
10 I have read the transcript and the same is true and  
11 accurate save and except for any corrections as made  
12 by me on the Correction Page herein.

13  
14 Signed at \_\_\_\_\_,  
15 on the \_\_\_\_\_ day of \_\_\_\_\_, 2016.

16  
17  
18  
19  
20  
21  
22 Signature \_\_\_\_\_

23 Carl Ferrer