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The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BACKPAGE.COM LLC,)	
)	
Plaintiff,)	No. C12-954-RSM
)	
and)	
)	DECLARATION OF TODD
THE INTERNET ARCHIVE,)	NOVISEDLAK
)	
Plaintiff Intervenor)	
)	
vs.)	
)	
ROB MCKENNA, Attorney General of)	
Washington, et al.,)	
)	
Defendants, in their official capacities.)	

I, Todd Novisedlak, declare as follows:

- I have personal knowledge of the matters set forth in this declaration and am competent to testify to them.
- I am a detective with the Seattle Police Department. I am assigned to the High Risk Victims unit within the Vice Section and investigate crimes involving prostitution, promoting prostitution and the commercial sexual abuse of minors. I have personally

1 been involved in over 1200 investigations involving the crimes of prostitution, promoting
2 prostitution, and the commercial sexual abuse of minors.

3 3. In the course of conducting investigations into the commercial sexual abuse of minors, I
4 have visited the escort sections of various websites, including Backpage.com, and viewed
5 hundreds of advertisements for what appeared to be prostitution services. I have
6 personally been involved in over a dozen investigations where our team has contacted,
7 recovered, and identified juvenile girls after seeing their advertisements posted on a
8 website. I have never contacted any person, juvenile or otherwise, posting
9 advertisements on the escorts section of Backpage.com who was advertising for
10 legitimate escort services.

11 4. During the course of working in the Vice Unit, I have learned that Backpage.com submits
12 referrals for suspected juveniles posting on Backpage.com to the National Center for
13 Missing and Exploited Children (hereinafter referred to as "NCMEC"). I am also aware
14 that NCMEC prepares reports based on the referrals and forwards its reports to the FBI.
15 The FBI then distributes the reports to various local law enforcement agencies, including
16 the High Risk Victims section of the Seattle Police Department's VICE Unit. I have
17 personally received and reviewed these reports that were initiated by a Backpage.com
18 referral.

19 5. On June 11, 2012, I received one such report by email from the FBI. This report
20 contained information submitted by Backpage.com to NCMEC's CyberTipline on June 8,
21 2012.

22 6. The report concerned an advertisement posted on Backpage.com (Post ID 9806602) on
23 June 7, 2012 under the "Seattle escorts" section of the website. A copy of the posting

1 was attached to the email I received from FBI SA Vienneau. The posting appeared to
2 depict a minor female, later identified as 15-year-old C.C.

3 7. The advertisement contained a contact phone number from the 253 area code with a 632
4 prefix, six photos of the child C.C., and the following language: "Hi My Name Is Ari
5 And Im 19 Years Old Im Whitee Im 5;8 I WY180 Im thick In All The Right Places I
6 Have DD 40 Tits N A Big Booty :)". A copy of this advertisement is attached as
7 EXHIBIT A.

8 8. According to NCMEC's report, Backpage.com reported the June 7 advertisement to
9 NCMEC after an anonymous person using the email address sgc1984@live.com
10 submitted to Backpage.com the following comment: "?Under age?"

11 9. On June 11, 2012, I went to the King County juvenile detention center and interviewed
12 C.C. I confirmed that C.C. was 15-years-old and that she had arranged to have sexual
13 intercourse with K.S. for \$80.

14 10. I subsequently received and reviewed Federal Way Police Department's incident report
15 P12007081. The report includes a signed statement by K.S., a 29-year-old male. K.S.
16 states that he met C.C. on an unidentified website. He further states that he arranged to
17 meet her at her apartment and pay her \$50 for sexual intercourse. K.S. states that he went
18 to the address of C.C. and gave her \$50. The report further states that C.C. was arrested
19 by Federal Way police officers and booked into the King County juvenile detention
20 center for prostitution on June 11, 2012.

21 11. That same day, I located another advertisement for 15-year-old C.C. posted on
22 Backpage.com on June 10, 2012 (Post ID 9840318) under the "Wenatchee escorts"
23 section of the website. The advertisement is attached as EXHIBIT B. The advertisement

1 included six of the same pictures of C.C. as contained within the June 7 advertisement.
2 The advertisement further included the same phone number as the June 7 advertisement
3 and similar language to the June 7 advertisement.

4 12. That same day, I emailed Backpage.com and requested the removal of this advertisement
5 depicting fifteen-year-old C.C. I informed Backpage.com that the advertisement depicted
6 a verified juvenile. I also requested that any other advertisements posted by the same user
7 be removed as well. This email correspondence is attached as EXHIBIT C.

8 13. On June 12, 2012, a representative of Backpage.com responded to my June 11 email,
9 stating that Backpage.com had removed the advertisements on Monday, June 11. This
10 further correspondence is contained within EXHIBIT C.

11 14. On June 19, 2012, I received a second NCMEC report from the FBI. This report
12 contained information submitted by Backpage.com to NCMEC's Cyber Tipline on June
13 14, 2012.

14 15. The report concerned an advertisement posted on Backpage.com under the "Seattle
15 escorts" section of the website on June 14, 2012 (Post ID 9866875). The posting was
16 attached to the email I received from SA Vienneau. The June 14 advertisement, attached
17 as EXHIBIT D, contains two of the same pictures I had seen on the June 7 and June 11
18 advertisements for 15-year-old C.C. The advertisement also lists the same phone number
19 as that listed in the previous two advertisements I reviewed.

20 16. According to the second NCMEC report, Backpage.com reported the June 14
21 advertisement because a Backpage.com moderator felt that the person in the
22 advertisement looked young.

1 17. I subsequently reviewed six more advertisements displaying pictures of C.C. from
2 Backpage.com. The dates of the postings were: June 15, 2012 (Post ID 9884350); June
3 18, 2012 (Post ID 9909799); June 19, 2012 (Post ID 9919995); June 20, 2012 (Post ID
4 9926062); June 20, 2012 (Post ID 9927532); and June 21, 2012 (Post ID 9936107).

5 These advertisements are attached as EXHIBITS E-J. Each of these was printed off of
6 Backpage.com on June 22, 2012, indicating to me that the advertisements were still
7 active on the internet. Each of these advertisements listed the same phone number as the
8 previous three advertisements I had reviewed. Each of these advertisements also
9 included the same pictures of 15-year-old C.C. that I had seen in the previous three
10 advertisements. All but one of the nine advertisements for 15-year-old C.C. contained
11 the following prices per unit of time: 15-20 Min - \$60; 30 Min - \$80; 1 Hr - \$110.

12 18. I subsequently reviewed King County Sheriff's Incident Report 12-145643. This report
13 states that on June 24, 2012, an undercover police officer with the King County Sheriff's
14 Office viewed an advertisement from Backpage.com (Post ID 9944893). This
15 advertisement is attached as EXHIBIT K.

16 19. According to KCSO 12-145643, the undercover officer called the number on this
17 Backpage.com advertisement and arranged a meeting with a young-sounding female.
18 The officer and the female agreed on a price of \$80 for 30 minutes. The female gave the
19 undercover officer an address for the meeting. Upon arriving at the address, the
20 undercover officer discovered fifteen-year-old C.C. The officer recognized C.C. from the
21 pictures and recognized her voice from the phone calls arranging the meeting.

22 20. I reviewed the same advertisement that was used by the undercover officer and
23 recognized the same pictures of C.C. that I had seen on the previous 9 advertisements for

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15-year-old C.C. The advertisement also included the same phone number that had been used in the previous 9 advertisements.

21. I, Todd Novisedlak, declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Executed this 6 day of July, 2012 at SEATTLE, WA.



Todd Novisedlak

Exhibit A

backpage.com > seattle adult entertainment > seattle escorts

[Report Ad](#)

Ari - 19

Posted: Thursday, June 7, 2012 3:53 PM

Reply: [click here](#)

Hi My Name Is Ari And Im 19 Years Old Im Whitee Im 5;8 I WY 180 Im Thick In All The Right Places I Have DD 40 Tits N A Big Booty :)

Federal Way Wa 98003

 Call Me

15-20Mn:60\$\$

30Mn: 90\$\$

1Hr:120\$\$

Poster's age: 19

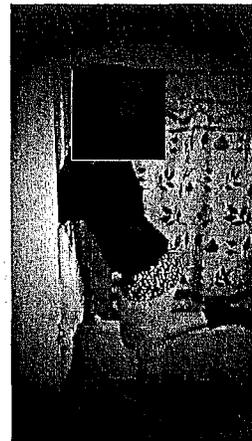
• Location: Federal Way

• Post ID: 9806602 seattle

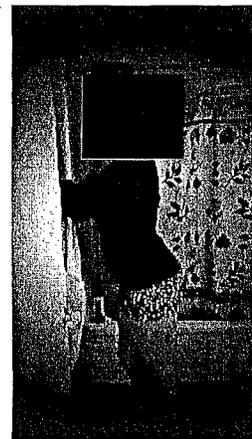
[Email this ad](#)



[Enlarge Picture](#)



[Enlarge Picture](#)



[Enlarge Picture](#)



[Enlarge Picture](#)



[Enlarge Picture](#)



[Enlarge Picture](#)

Exhibit B

This is Google's cache of <http://wenatchee.backpage.com/FemaleEscorts/deedee-18/9840318>. It is a snapshot of the page as it appeared on Jun 12, 2012 03:49:52 GMT. The current page could have changed in the meantime: [Learn more](#)

These search terms are highlighted: **backpage 9840318**

[Text-only version](#)

wenatchee, wa free classifieds



[backpage.com](#) > [wenatchee adult entertainment](#) > [wenatchee escorts](#)

deedee - 18

Posted: Sunday, June 10, 2012 9:58 PM

[Report Ad](#)

Reply: [click here](#)



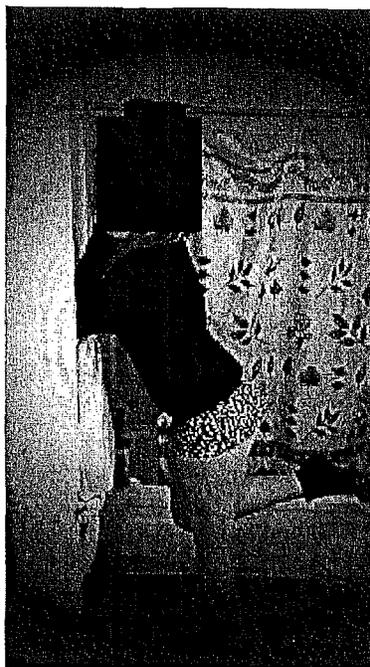
[Enlarge Picture](#)

Hi My Name Is DeeDee N Im 18 Im 5;8 I Way 180 Think In All The Right Places N I Have DD 40 Tits :)
Federal Way Wa





[Enlarge Picture](#)



[Enlarge Picture](#)

15-20Min:60\$\$

30Min:80\$\$

1Hr:110\$\$



[Enlarge Picture](#)



[Enlarge Picture](#)

Poster's age: 18

• Location: Federal Way



[Enlarge Picture](#)



[Enlarge Picture](#)

• Post ID: 9840318 wenatchee

[Email this ad](#)

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Exhibit C

Richey, Valiant

From: Novisedlak, Todd <Todd.Novisedlak@seattle.gov>
Sent: Tuesday, June 19, 2012 11:55 AM
To: Richey, Valiant
Subject: FW: Child Exploitation Report

Val,
here's the BP response from June 12 when I advised Cheyene was a verified juvenile. Standby for follow up email.....

Detective Todd Novisedlak #5884
Seattle Police Vice Section
High Risk Victims Unit, B751A
FBI Innocence Lost Task Force
610 5th Avenue, PO Box 34986
Seattle, WA 98124-4986
(206) 684-8666 desk
(206) 684-4635 fax
todd.novisedlak@seattle.gov

From: Abuse Backpage [bp-abuse@backpage.com]
Sent: Tuesday, June 12, 2012 8:40 AM
To: Novisedlak, Todd
Cc: Andrew Backpage
Subject: Re: Child Exploitation Report

Detective Novisedlak,

Our Abuse Dept removed the ads as you requested Monday evening. Thank you for bringing this to our attention.

James Hammer

On Mon, Jun 11, 2012 at 7:40 PM, Novisedlak, Todd
<Todd.Novisedlak@seattle.gov<<mailto:Todd.Novisedlak@seattle.gov>>> wrote:

<http://washington.backpage.com/FemaleEscorts/deedee-18/9840318>

The above listed ad depicts a verified juvenile. Please take down this and other ads by the same user.

Detective Todd Novisedlak #5884
Seattle Police Vice Section
High Risk Victims Unit, B751A
FBI Innocence Lost Task Force
610 5th Avenue, PO Box 34986
Seattle, WA 98124

Exhibit D

backpage.com > seattle adult entertainment > seattle escorts

[Report Ad](#)

Cindy Tha Thickkk Whitee Gurl :) - 18

Posted: Thursday, June 14, 2012 12:09 AM

Reply: [click here](#)

Hi My Name Is Cindy N Im 18Years Old N Im 5;8 N Way 180 N Im Whitee Mexican N Black N Im Looking Foree Sum Fun :)
Sea-Tac Wa

15-20Min-60\$\$
30Min-80\$\$
1Hr-110\$\$

Poster's age: 18

• Location: Sea Tac

• Post ID: 9866875 seattle

• Other ads by this user:

[Arl - 18](#) (Federal Way) adult entertainment: escorts

[CeCe - 18](#) (Federal Way) adult entertainment: escorts

[Email this ad](#)



[Enlarge Picture](#)



[Enlarge Picture](#)

(206) 684-8666 desk

(206) 684-4635 fax

todd.novisedlak@seattle.gov<mailto:todd.novisedlak@seattle.gov>

Exhibit E

seattle, wa free classifieds

[Post an Ad](#)

[backpage.com](#) > [seattle adult entertainment](#) > [seattle escorts](#)

[Report Ad](#)

Star Tha Thickkk Whitee Gurl :) - 19

Posted: Friday, June 15, 2012 8:50 PM

Reply: [click here](#)

Hi Im Star N Im 19 N Im 5;8 N I Way 180 N Im Thickness In All Thee Right Places N I Havee Big Tities N Im Looking Foree Sum Funn So Hit Me Up ;D
Federal Way Wa



15-20Min+60\$\$
30Min-80\$\$
1Hr-110\$\$

Poster's age: 19

- Location: Federal Way
- Post ID: 9884350 seattle
- Other ads by this user:

[Miss.Whitee Chocalate Tha Sexil Whitee Gurl :\) - 18](#) (Federal Way)adult entertainment; escorts

[Miss.CoCo Tha Sexil Whitee Gurl :\) - 19](#) (Federal Way)adult entertainment; escorts

[Star Tha Thickkness Bitch :\) - 20](#) (Federal Way)adult entertainment; escorts

[Sabrina Ummm ThickkNess :\) - 20](#) (Federal Way)adult entertainment; escorts

[NeNe Tha Thickkk Whitee Gurl :\) - 20](#) (Federal Way)adult entertainment; escorts

[Email this ad](#)



[Enlarge Picture](#)

Exhibit F

washington, wa free classifieds

[Post an Ad](#)

[backpage.com](#) > [washington adult entertainment](#) > [washington escorts](#)

[Report Ad](#)

NeNe Tha Thickkk Whitee Gurl :) - 20

Posted: Monday, June 18, 2012 1:29 PM

Reply: [click here](#)

Hi Im Ne-Ne N Im 20 I Got Big Titles N A Big Booty Im 5;8 N Way 180 N Im Thick In All The Right Places
N Im A Kool Person So Hit Me Up If Yuhh Wanna Meet Me :D
Federal Way Wa

[REDACTED]

15-20Min-60\$\$

30Min-80\$\$

1Hr-110\$\$

Poster's age: 20

- Location: Federal Way
- Post ID: 9909799 washington
- Other ads by this user:

[Miss.Whitee Chocalate Tha Sexii Whitee Gurl:\) - 18](#) (Federal Way)adult entertainment: escorts

[Miss.CoCo Tha Sexii Whitee Gurl:\) - 19](#) (Federal Way)adult entertainment: escorts

[Star Tha Thickkness Bilch :\) - 20](#) (Federal Way)adult entertainment: escorts

[Sabrina Ummm ThickkNess :\) - 20](#) (Federal Way)adult entertainment: escorts

[Clorissa Tha Thickkk Whitee Gurl :\) - 20](#) (Federal Way)adult entertainment: escorts

[Email this ad](#)



[Enlarge Picture](#)



[Enlarge Picture](#)

Exhibit G

washington, wa free classifieds

[Post an Ad](#)

[backpage.com](#) > [washington adult entertainment](#) > [washington escorts](#)

[Report Ad](#)

Sabrina Ummm ThickkNess :) - 20

Posted: Tuesday, June 19, 2012 10:18 PM

Reply: [click here](#)

Hi Im Sabrina N Im 20 N Im A Whitee Gurl N Im 5;8 N Way 180 N Im Thick In All The Right Places :) Hit Me Up If Yuhh Wanna Talk
Federal Way Wa

[Redacted]

15-20Min-60\$\$
30Min-80\$\$
1Hr-110\$\$

Poster's age: 20

- Location: Federal Way
- Post ID: 9919995 washington
- Other ads by this user:

[Miss.Whitee Chocalate Tha Sexli Whitee Gurl :\) - 18](#) (Federal Way) [adult entertainment: escorts](#)

[Miss.CoCo Tha Sexli Whitee Gurl :\) - 19](#) (Federal Way) [adult entertainment: escorts](#)

[Star Tha Thickkness Bitch :\) - 20](#) (Federal Way) [adult entertainment: escorts](#)

[NeNe Tha Thickkk Whitee Gurl :\) - 20](#) (Federal Way) [adult entertainment: escorts](#)

[Clorissa Tha Thickkk Whitee Gurl :\) - 20](#) (Federal Way) [adult entertainment: escorts](#)



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Exhibit H

washington, wa free classifieds

[Post an Ad](#)

[backpage.com](#) > [washington adult entertainment](#) > [washington escorts](#)

[Report Ad](#)

Star Tha Thickkness Bitch :) - 20

Posted: Wednesday, June 20, 2012 11:51 AM

Reply: [click here](#)

Hi Im Star N Im 20 N Im 5;8 N Way 180 N Big Titles N A Big Booty N Im A Fun Person Teew Meet Me A See :)
Federal Way Wa



15-20Min-60\$\$
30Min-80\$\$
1Hr-110\$\$

Poster's age: 20

- Location: Federal Way
- Post ID: 9926062 washington
- Other ads by this user:

[Miss.Whitee Chocalate Tha Sexil Whitee Gurl :\) - 18 \(Federal Way\)adult entertainment: escorts](#)

[Miss.CoCo Tha Sexil Whitee Gurl :\) - 19 \(Federal Way\)adult entertainment: escorts](#)

[Sabrina Ummm ThicckNess :\) - 20 \(Federal Way\)adult entertainment: escorts](#)

[NeNe Tha Thicckk Whitee Gurl :\) - 20 \(Federal Way\)adult entertainment: escorts](#)

[Clorissa Tha Thicckk Whitee Gurl :\) - 20 \(Federal Way\)adult entertainment: escorts](#)

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Exhibit I

washington, wa free classifieds

[Post an Ad](#)

[backpage.com](#) > [washington adult entertainment](#) > [washington escorts](#)

[Report Ad](#)

Miss.CoCo Tha Sexii Whitee Gurl:) - 19

Posted: Wednesday, June 20, 2012 4:25 PM

Reply: [click here](#)

Hi My Name Is Miss CoCo N Im 5;8 N Way 180 N Im Thicck In All The Right Places N Im A Very Funni Person N I Wanna Have Sum Fun Hit Me Up :)

FEDERAL WAY



15-20Min-60\$\$
30Min-80\$\$
1Hr-110\$\$

Poster's age: 19

- Location: Federal Way
- Post ID: 9927532 washington

• Other ads by this user:

[Miss.Whitee Chocolate Tha Sexii Whitee Gurl:\) - 18](#) (Federal Way)adult entertainment: escorts

[Star Tha Thickness Bitch :\) - 20](#) (Federal Way)adult entertainment: escorts

[Sabrina Ummm ThickkNess :\) - 20](#) (Federal Way)adult entertainment: escorts

[NeNe Tha Thickkk Whitee Gurl :\) - 20](#) (Federal Way)adult entertainment: escorts

[Clorissa Tha Thickkk Whitee Gurl :\) - 20](#) (Federal Way)adult entertainment: escorts

[Email this ad](#)



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[Enlarge Picture](#)



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Exhibit J

washington, wa free classifieds

[Post an Ad](#)

[backpage.com](#) > [washington adult entertainment](#) > [washington escorts](#)

[Report Ad](#)

Miss.Whitee Chocalate Tha Sexii Whitee Gurl:) - 18

Posted: Thursday, June 21, 2012 4:44 PM

Reply: [click here](#)

Hi Im Miss Chocalate N Im 18 N Think In All The Right Places N Im 5;8 N Way 180 Im Whitee Mexican Black I Have Big Tits So If Yuhh Like Wat U See Hit Me Up :)
Federal Way Wa



15-20Min-60\$\$
30Min-80\$\$
1Hr-110\$\$

Poster's age: 18

- Location: Federal Way
- Post ID: 9936107 washington
- Other ads by this user:

[Miss.CoCo Tha Sexii Whitee Gurl:\) - 19](#) (Federal Way)adult entertainment: escorts

[Star Tha Thickkness Bitch :\) - 20](#) (Federal Way)adult entertainment: escorts

[Sabrina Ummm ThickkNess :\) - 20](#) (Federal Way)adult entertainment: escorts

[NeNe Tha Thickkk Whitee Gurl :\) - 20](#) (Federal Way)adult entertainment: escorts

[Clorissa Tha Thickkk Whitee Gurl :\) - 20](#) (Federal Way)adult entertainment: escorts

[Email this ad](#)



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[Enlarge Picture](#)



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Exhibit K

scattle, wa free classifieds

Backpage

backpage.com > scattle adult entertainment > scattle escorts

CeeCee Tha Thicck Whitee Gurl :) - 19

[Report Ad](#)

Posted: Friday, June 22, 2012 6:03 PM

Reply: [click here](#)

I'm CeeCee N In 10 N In 5th N Way 100 In Thicck In All The Right Places N In Fobbyj Faces Sun Fun Also In Merican Whitee N Also Black So :D
I'd do it w/ any wh:



15-2000hr 0025
700hr 3025
110-11015

Post's page: 19

Location: Federal Way

Post ID: ceecce0000000000



[Miss Whitee Chocolate Tha Sexii Whitee Gurl :\) - 18](#) (9)

[Miss CoCo Tha Sexii Whitee Gurl :\) - 19](#) (8)

[Star Tha Thicckness Bitch :\) - 20](#) (8)

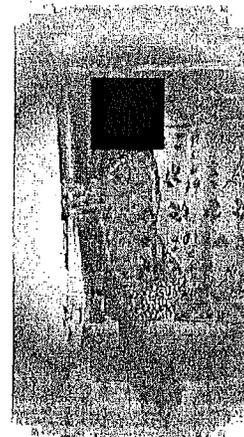
[Sabrina Ummm ThicckNess :\) - 20](#) (8)

[NeNe Tha Thicckk Whitee Gurl :\) - 20](#) (8)

[Email this ad](#)



Entire Picture



Entire Picture