

# **EXHIBIT A**

# **EXHIBIT A**

## **Part 1 of 3**

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

THOMAS DART, SHERIFF OF	)	
COOK COUNTY	)	
	)	
<b>Plaintiff,</b>	)	
	)	Case No. 09 C 1385
v.	)	
	)	Judge Grady
CRAIGSLIST, INC.,	)	
	)	Plaintiff Demands Trial By Jury.
	)	
<b>Defendant.</b>	)	
	)	
	)	

PROPOSED AMENDED COMPLAINT

NOW COMES THOMAS DART, as Sheriff of Cook County, Illinois (“the Sheriff”), by and through his attorneys, QUERREY & HARROW, LTD., along with Women of Power Alumni Association and Dreamcatcher Foundation, (collectively “Plaintiffs”), by and through their attorneys, Chicago Alliance Against Sexual Exploitation, for their Proposed Amended Complaint against Craigslist, Inc., (“Defendant”), and state as follows:

BACKGROUND

1. Prohibited activity typically transpires in secret. Rare is the instance when such conduct occurs unabashed. Yet as these words are read, Defendant’s website craigslist.org (“Craigslist”) is facilitating prostitution. To say Craigslist’s “erotic services” forum makes prostitution accessible is an understatement. Advocacy groups consider the website to be one of the largest sources for prostitution in the country.

2. Prostitution arrests in Cook County via Craigslist are incessant. Arrests consume the time, money, and resources of law enforcement agencies. This civil action seeks damages, abatement costs, and injunctive relief to remedy Defendant's creation of and contribution to a public nuisance in Cook County. The Plaintiffs seek to close only the erotic services section of Craigslist. This section is a convenient clearinghouse for pimps, prostitutes, and patrons that enables sellers to advertise and buyers to peruse discreetly.

3. Defendant's facilitation of prostitution meets the definition of a public nuisance – a condition that injures the property, health, and safety of many people. Prostitution spawns STDs, inflicts psychological scars, and creates a market for human trafficking. These realities belie the bromide that prostitution is simply “two consenting adults.”

4. Conduct that violates established laws is quintessential evidence of nuisance. Defendant's conduct contravenes city, state, and federal prohibitions on prostitution. They are as follows: § 8-8-020 of the Chicago Municipal Code, which proscribes directing persons to prostitutes; 720 ILCS § 5/11-15, which criminalizes soliciting for a prostitute; and 18 U.S.C. § 1952, which prohibits facilitating prostitution. Defendant's violations of these restrictions establish its conduct is a public nuisance.

## JURISDICTION AND VENUE

5. The Court has jurisdiction over the subject matter pursuant to 28 U.S.C. § 1332, in that the amount in controversy exceeds \$75,000, exclusive of interest and costs, and the action is between citizens of different States.

6. The Court has personal jurisdiction over Defendant because it has continuous and systematic contacts with Illinois and the events giving rise to the action are related to Defendant's contact with the state. Additionally, Defendant has purposefully directed its activities at Illinois residents by maintaining a webpage devoted to the Chicagoland area.

7. Venue is proper in this judicial district under 28 U.S.C. §§ 1391(b) and (c) because the events giving rise to these claims occurred in this district, and Defendant conducts business in this district.

## ADDITIONAL PLAINTIFFS

### **A. The Background of Additional Plaintiffs Women of Power Alumni Association and Dreamcatcher.**

8. The Women of Power Alumni Association ("WOPAA") is a 501c3 non-profit organization based in Chicago, Illinois. It was founded in June of 2002.

9. WOPAA is run by formerly incarcerated women and recovering drug addicts.

10. WOPAA helps women achieve recovery and stabilization as they re-enter communities following incarceration.

11. The Dreamcatcher Foundation (“Dreamcatcher”) is a 501c3 non-profit organization based in Chicago, Illinois. It was founded in 2007.

12. Dreamcatcher is run by survivors of prostitution, women who were beaten, raped, arrested, incarcerated, and sold by pimps to third parties for sexual use and degradation in various venues of the sex trade, including in Chicago.

13. Dreamcatcher seeks to help girls and women avoid, survive, or achieve recovery from prostitution.

14. The State of Illinois and federal government recognizes this population needs residential, outpatient, and supportive services.

15. Members of the Board of Directors of WOPAA and Dreamcatcher have successfully transitioned through the Cook County Sheriff’s Department of Women’s Justice Services.

16. While founded in conjunction with the Cook County Sheriff’s Department of Women’s Justice Services, WOPAA and Dreamcatcher rely on private donations and grant money.

**B. The Methodologies of WOPAA and Dreamcatcher.**

17. WOPAA and Dreamcatcher use peer mentors to help the recovery of drug addicts and sex trade victims in ways which professionals are unable to achieve. It provides training for peer mentors, community outreach, family integration assistance, and workshops for formerly incarcerated and at-risk women.

18. WOPAA and Dreamcatcher focus particularly on victims of the sex trade. It provides benefits and services to female victims of Domestic Human Trafficking and sexual exploitation. Their target population is victims of human trafficking forced into prostitution.

19. WOPAA and Dreamcatcher work with the Cook County Sheriff's Department of Women's Justice Services to rescue women arrested for prostitution. The immediate response culminates in the transport of the women to a Domestic Violence Shelter, Recovery Home, or Transitional Housing.

20. The goal of the intervention at the point of arrest is to engage the women long enough to connect her with the necessary services. Resources provided include emergency housing, placement for long housing, physical and mental health referrals, job training, and referrals for employment.

21. WOPAA and Dreamcatcher collaborate with shelters who can provide housing and services, transportation to shelters, and medical programs.

22. WOPAA and Dreamcatcher have each expended resources in excess of \$75,000 in providing services and outreach to victims of the sex trade - including women from Craigslist.

**D. Rehabilitating Women From Craigslist's Adult Services.**

23. Both WOPAA and Dreamcatcher provide girls and women who have been prostituted, via Craigslist and other forums, with direct mentorship, guidance,

support, and coaching as they attempt to survive the hardships and abuse that characterize their lives.

24. The women of WOPAA and Dreamcatcher have had significant experience with the conditions that permeate prostitution, namely: sexual abuse, drug addiction, incarceration.

25. All of the women working in WOPAA and Dreamcatcher are in recovery and have experience providing mentorship to girls and women who have escaped from, or are still experiencing, the abuses and harms of prostitution.

26. The work of WOPAA and Dreamcatcher for girls and women leaving prostitution is time consuming and emotionally challenging, consisting of organized events like trainings, workshops and support groups but also daily mentorship, support, and referrals.

27. Among the girls and women who have been provided with mentorship, support, referrals, and access to training, education, and other support services through Dreamcatcher and WOPAA, are individuals who have been marketed for prostitution via Craigslist. Their experiences include, but are not limited to, the following:

a. A girl who was purchased for sex via ads on Craigslist multiple times before she turned eighteen, after having first being sold in prostitution around the time of her sixteenth birthday.

b. A 19-year-old woman who was unknowingly marketed for prostitution via Craigslist after she attempted to seek modeling work.



c. A 31-year-old single mother of two who attempted to survive drug addictions by selling drugs and marketing herself on Craigslist for prostitution.

d. A 31-year-old mother of three who has lost custody of all of her children, has been arrested for prostitution over two dozen times, and has used Craigslist to market herself for prostitution, in Chicago and other cities where Craigslist is available.

### INITIAL PARTIES

28. Upon information and belief, Craigslist, Inc., is a Delaware corporation with its principal place of business at 1381 9th Avenue, San Francisco, California. It was created in connection with the website [craigslist.org](http://craigslist.org), which provides online classified advertisements. “Defendant” refers to Craigslist, Inc., while “Craigslist” denotes the website itself.

29. Thomas Dart is the duly elected Sheriff of Cook County, Illinois. Dart is a citizen of the United States who resides in Cook County, Illinois.

### FACTS

#### **A. Craigslist’s Background.**

30. The late 1990s were the halcyon days for Internet startups. A number of websites gained an early foothold and later became Internet institutions. Craigslist is one such site. What began as a free classifieds service for the San Francisco Bay area has mushroomed into a multimillion dollar a year, globe-girdling website.

31. Craigslist is now a forum for locals in 450 cities in 50 countries. The site

allows users to post listings for jobs, housing, dating, used items, and community information. It also includes discussion forums on various topics.

32. Defendant maintains a specific webpage for Chicago and its environs, located at [chicago.craigslist.org](http://chicago.craigslist.org).

33. Craigslist bears no banner advertisements. Upon information and belief, its sole source of revenue is paid job ads in select cities – \$75 per ad in San Francisco; \$25 per ad in other cities and paid broker apartment listings in New York (\$10 per ad).

34. Craigslist maintains over thirty million new classified advertisements each month. It is the leading classifieds service in any medium and one of the top job boards in the world.

35. Craigslist is viewed over nine billion times each month, putting it in 47th place among web sites world wide and ninth place among web sites in the United States.

36. Upon information and belief, Defendant's revenues in 2007 were approximately \$55 million. Revenues for 2008 are estimated at \$80 million.

**B. Craigslist's Content.**

37. Craigslist is not limited to innocuous postings selling sofas and advertising apartments. Craigslist has an erotic services section where people openly promise sex for money.

38. Erotic services is located on the website's homepage in the "services" section of the page. (See copy of webpage attached as Exhibit A).

39. Craigslist's erotic services has existed since at least September of 2003. (See copy of webpage from September 19, 2003, obtained from archive.org, attached as Exhibit B).

40. Erotic services is placed among other service forums like automotive, computer, real estate, and legal. These other forums contain posts advertising services in exchange for compensation.

41. Defendant's placement of erotic services alongside other service forums demonstrates erotic services is for individuals willing to provide sexual services for money.

42. Additionally, the title of the forum, "erotic services," speaks for itself. "Erotic" is defined as "satisfying sexual desire." (Random House Webster's Dictionary 239 (3d ed. 1998)). "Services" is defined as "the act of doing something useful for a person or company for a fee." (Black's Law Dictionary 1399 (8th ed. 2004)).

43. When users click on the erotic services link, they find Defendant has further delineated twenty-one categories. Defendant uses abbreviations to reference its twenty-one categories. Thus, "m" stands for men, "w" for women, "4" means "for", and "t" means transvestite.

44. The twenty-one categories Defendant created are: w4m, m4m, m4w, w4w, t4m, m4t, mw4mw, mw4w, mw4m, w4mw, m4mw, w4ww, m4mm, mm4m, ww4w, ww4m, mm4w, w4mm, t4mw, mw4t. (See copy of erotic services webpage attached as Exhibit C).

45. Users then click on a category. Within each category are posts users can search through.

46. To further aid the search process, Defendant provides a word search function. This allows users to search for a prostitute based on desired search terms relating to location, type of service, physical dimensions, or ethnicity.

47. While Defendant warns that “offers for or solicitation of prostitution” are prohibited, such posts are the *raison d’ être* of erotic services.

### **C. Craigslist’s Erotic Services Posts.**

48. Upon entering a category, users will first scan a page that provides the titles of postings. The title of a typical post provides a short description, relevant category, age, and location.

49. Clicking on the post title opens the post. Within the post is information about prices, services, and physical attributes, often accompanied by pornographic images.

50. Most posts in the erotic services forum clearly provide for prostitution. Others use thinly veiled code words. For example, “roses,” “diamonds,” “kisses,” or “thank yous” means dollars. “Greek” refers to anal sex. While the methods differ, the aim is the same: money for sex.

51. Terms such as “young and fresh,” “virgin,” “new girl,” and “new to Craigslist” are believed by some advocacy groups to be code words for minors. (See KlaasKids Foundation’s Human Trafficking Report Newsletter, January 2009, attached

as Exhibit D).

52. The following are a microcosm of Craigslist's erotic services:

**A. ASIAN S.E.X KITTIN - w4m - 23 (OHARE AIRPORT)**

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Reply to: [pers-1005312414@craigslist.org](mailto:pers-1005312414@craigslist.org)

Date: 2009-01-23, 9:53PM CST

For a total mind b.l.o.w.i.n.g expeiance, give me a call...

**B. ~•□•~STUNNING~•□•~SEXY~•□•~SOPHISTICATED~•□•~ - w4m  
- 27 (Chicago/sur areas)**

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Reply to: [pers-985562996@craigslist.org](mailto:pers-985562996@craigslist.org)

Date: 2009-01-08, 6:20PM CST

In A hurry??

15 Min \$50 Roses

Wanna Have A Wild Time??

1hour \$150 Roses

Ready To Get Naughty And Also Relax!!

Wanna Relax At your Own Home!!

same Roses 4 Outcall

How About A G-R-E-E-K Lesson I'm A Great Student!!

**C. Spend the night with me - w4m**

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Reply to: [pers-1003753366@craigslist.org](mailto:pers-1003753366@craigslist.org)

Date: 2009-01-22, 6:42PM CST

My classy sex appeal and stunning beauty will initially attract you by spontaneous wild side and erotic nature are sure to captivate your full attention for as long as you can handle With a tight curvy figure silky smooth skin and captivating brown eyes I'm sure your every sense will be pleased by my erotic looks tempting touch and sweet seductive smell call jessica

**D. ----YOUNG-----TIGHT-----&-----JUST----- RIGHT-----4---YOU--- -  
w4m - 18 (Exit I-94 Old Orchard Rd:SKOKIE, IL)**

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Reply to: [pers-1010719152@craigslist.org](mailto:pers-1010719152@craigslist.org)

Date: 2009-01-27, 11:14PM CST

Hey Guys, its \*K\*I\*T\*O\*Y\* and I'm AVAILABLE NOW!!!

I'm truly every man's FANTASY!

I'm a 18 year old, 5'9", 120 pound, sweetheart with long black hair and adorable hazel eyes. I have a TIGHT LITTLE BODY that'll keep you coming back for more!!!  
TO MAKE YOUR FANTASY COME TRUE, I'M THE GIRL FOR YOU!!!

- E. **\*\*\*2 GIRLS\*\*\*BODIES OF SUPERSTARS\*\*\*SKILLS OF PORNSTARS\*\*\* - w4m (SCHAUMBURG INCALLS/OUTCALLS ALL OVER)**

Reply to: [pers-1007165221@craigslist.org](mailto:pers-1007165221@craigslist.org)  
Date: 2009-01-25, 1:37PM CST

My mission and Pleasure is to Provide You with That Complete Erotic Sensual Encounter. Your experience with Me will be Unrushed, Passionate and Personalized for You, with Plenty of Time to Explore. I provide safe, sensual sessions with no rush. Ask about my 2 girl specials!

- F. **Femme Son looking for Sugar Daddy - m4m - 19 (Travel Chicago)**

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Reply to: [pers-987529501@craigslist.org](mailto:pers-987529501@craigslist.org)  
Date: 2009-01-10, 11:48AM CST

Just another young white college boy in the city looking for some scholarship from a generous older man. Clean and disease free, shaved. I am mostly sub but I can dom on occasion. Suggested donation for a massage is 75 for in the city, no hidden fees.

- G. **HOT~~TRANSEXUAL~~VISITING~~SHORT~~TIME~~IN~TWON~ - t4m - 27 (O'HARE/ROSEMONT~~)**

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Reply to: [pers-1005644116@craigslist.org](mailto:pers-1005644116@craigslist.org)  
Date: 2009-01-24, 9:33AM CST

iam sexy cristal, a natural,beautiful and sexy latina ready to make your dreams come true, let me seduce you with my hot body, i have a very nice,slim body, i stand 5'4 135bs 36d-22-38 very sexy and hot,i love to show my affections in all the right places,i have 7"surprises and iam always ready to play

- H. **Handsome Puerto Rican - m4w - 24 (Chicagoland)**

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Reply to: [pers-1000723771@craigslist.org](mailto:pers-1000723771@craigslist.org)  
Date: 2009-01-20, 3:32PM CST

Hello to all the great ladies out there. Due to the way the economy is I am willing to do almost anything to get money. I'm 5'11" and very good looking. I will do

anything. I will go out with you on a night in town; I will be your boyfriend for the night. Ill go to a wedding with you or clubbing or even strip for a bachelorette party or just for you or a group of girls. I have no age limit from 18-99, I have no look preferences you can be 3'5" or 7' tall be skinny or heavy I don't care I just need money.

**I. HOT EROTIC MASSAGE/ESCORT FROM HOT BOI - m4m - 20 (Chicago)**

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Reply to: [pers-1004104258@craigslist.org](mailto:pers-1004104258@craigslist.org)

Date: 2009-01-23, 4:21AM CST

Sexy outgoing hot boi giving erotic massage /escort service from hot 6ft 150lbs and 8 " and thick all for your erotic needs  
rates are 100 an hour and 350 for 4 or more hours and 1700 for the whole week

**J. Busty Blonde Pregant Beauty ~ Massage~Specials~ All Day~!!!~ - w4m - 28 (Barrington Rd & I-90)**

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Reply to: [pers-1009578861@craigslist.org](mailto:pers-1009578861@craigslist.org)

Date: 2009-01-27, 9:42AM CST

Have You Ever Fantasized About A Fully Nude, Full Body Erotic Massage, Given To You By A Busty Blonde Pregant Beauty!  
If You Have The Desire And Time For An Alluring Encounter, You Will Never Be Disappointed With The Erotic Experience That Awaits You.

**K. T e e ns for CASH.....Young Hot GIrlSS!!! open all night! \$150!!!!!! - w4m**

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Reply to: [pers-1005462616@craigslist.org](mailto:pers-1005462616@craigslist.org)

Date: 2009-01-24, 2:57AM CST

T e e ns for CASH.....Young Hot GIrlSS!!! open all night! \$150!!!!!!  
\$100 q u i c k i e  
youngest and hottest girls in chicagoland  
actual pic of Jennifer (19 ) all girls here are over 18!!!!!!

**L. Hott young girls needed for new naughty nanny service - m4ww - 35 (Chicago (South Midway))**

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Reply to: [pers-991610815@craigslist.org](mailto:pers-991610815@craigslist.org)

Date: 2009-01-13, 3:03PM CST

Are looking to make some good money in this tough economy. Minimum pay is \$25 per hour to look pretty and be a nanny to single fathers across the

chicagoland area. Ever fantasized about being a hot young sexy nanny for an attractive man and his children, then this job is for you. Looking to hire women ages 18 to 27 for this new enterprise. Must provide 3 pics (At least one sexy photo). Amateurs only. No professional ladies need apply. Anything that happens during your employment with clients is between two consenting adults. Pay is for hours in which you are performing duties specified in Naughty Nannies handbook.

(All errors in original. Some posts have been edited for content. The complete postings, with nude images, are attached as Exhibit E).

53. New advertisements are posted at an inexorable rate. Updated every few minutes, the Plaintiffs have determined the Chicago erotic services collects over 300 posts per day.

54. For example, over the span of four days, the w4m category alone logged over 1,000 posts. (See collection of posts from January 24-28, 2009 attached as Exhibit F).

55. Craigslist has cultivated an extensive user base through erotic services, as the section is Craigslist's most popular.

56. The popularity of erotic services was confirmed by an April 2007 study released by the website analysis firm Compete.com. The study examined eight American cities for one month and found "erotic services consistently garner the highest number of individual visitors for February – almost always twice as many as the next ranking category, averaging 260,000 people per city." (See Report Findings attached as Exhibit G).

57. While Defendant does not profit from erotic services per se, erotic services is the catalyst behind Craigslist being the ninth most popular website in the country.



Erotic services enables Defendant to charge fees of up to \$75 per post for job openings due to the significant web traffic garnered by erotic services.

58. Advocacy groups confirm the popularity of Craigslist's erotic services. The Polaris Project, a group against human sexual trafficking, believes Craigslist is now the single largest source for prostitution, including child exploitation, in the country. Love 146 works for the abolition of child sex slavery and exploitation. It notes Craigslist is commonly used to solicit prostitution and child prostitution. (See Portland Tribune article, "*Craigslist or Crimeslist?*" November 27, 2007, and Love 146 "*Craigslist Facts*" attached as Exhibit H).

**D. Craigslist's Entanglements with Law Enforcement.**

59. The blatancy of erotic services has made Craigslist the *bête noire* of law enforcement. Police departments across the country make arrests through Craigslist routinely.

60. Most arrests result in charges of prostitution and other illegalities. Some involve the pimping of children.

61. Atlanta Mayor Shirley Franklin charged Craigslist as being a significant source of child prostitution in her city. She asked Defendant to do more to prevent Craigslist from being used "as a means of promoting and enabling child prostitution." (See Atlanta Journal-Constitution article, "*Mayor: Web Site Enables Child Sex*" August 22, 2007, attached as Exhibit I).

62. Atlanta vice officer Kelleita Thurman said that Craigslist and similar sites

account for 85% of the sexual liaisons men arrange in Atlanta with boys and girls. (See Exhibit I).

63. Authorities across the country have also found Craigslist's erotic services to be popular with sex traffickers. (See articles and press release attached as Exhibit J). In one such instance, the FBI uncovered a sex ring involving child prostitutes in which the pimps "posted over 2,800 advertisements on craigslist.org." (See Exhibit J).

64. Connecticut Attorney General Richard Blumenthal wrote a letter on March 27, 2008, asking Defendant to purge the graphic solicitations for prostitution. (Letter is attached as Exhibit K). Blumenthal also asked Defendant to better enforce its rules prohibiting illegal activity such as prostitution.

65. Blumenthal noted that erotic services is rife with ads containing explicit language and pornographic images. Blumenthal sent the letter after several months of discussions with Defendant about curtailing prostitution ads.

66. Negotiations culminated in a "joint statement" between Defendant and forty state attorneys general, announced on November 6, 2008. (The joint statement is attached as Exhibit L).

67. The Illinois Attorney General was a signatory to the joint statement.

68. Per the joint statement, erotic service advertisers must provide valid identification and pay a small fee for each ad – \$5 to \$10 with a credit card.

69. Defendant has agreed to donate the money from the erotic services advertisements to charities, including those that combat child exploitation and human trafficking.

70. The joint statement is not binding on Defendant and bestows no authority on the attorneys general to enforce the terms. Its impact on prostitution has been imperceptible as arrests through Craigslist are unabated.

71. Ironically, the joint statement enables Defendant to receive money for the erotic services posts. While Defendant says it will donate this money to charity, the joint statement allows the website to generate goodwill and possible tax benefits through its proliferation of prostitution.

72. Prostitutes have found ways to circumvent the less than onerous restrictions posed by the joint statement as the following post attests:

**I WILL BE YOUR SEX SLAVE CALL ME ! - w4m - 22 (Mchenry County)**

Reply to: [pers-954483954@craigslist.org](mailto:pers-954483954@craigslist.org) [?]

Date: 2008-12-11, 6:29PM CST

In-call only

I used to post and haven't in a long time because now you gotta pay 5.00 to post up on this and i don't have a credit card luckily i got a way to post from a friend thanx friend lol so I am ready to be your sex slave so hope you call me :)

When you call I will give you more detail.

73. Proving that the joint statement with the attorneys general has done nothing to stem the tide of prostitution, erotic services continues to attract more than 300 posts per day.

74. Arrests continue as well. On February 20, 2009, federal and local authorities participated in a nationwide sting, arresting more than 571 individuals on prostitution related charges. They also uncovered 48 teenage prostitutes, some as young as thirteen. (See Associated Press article, *"FBI, Police Rescue Child Prostitutes Around U.S."* February 23, 2009, attached as Exhibit M).

75. In some instances, Craigslist was the conduit through which arrests were made. (See Boston Globe article, *"5 Arrested in U.S. Sting at Marriott"* February 21, 2009, attached as Exhibit N).

76. Chicagoland prostitution was also targeted. Forty-four people were arrested in the Chicago area: five were charged with running prostitution operations, thirty-four were charged with prostitution, and five were charged with soliciting prostitutes. (See Chicago Tribune article, *"Nationwide Prostitution Net"* February 24, 2009, attached as Exhibit O).

#### **E. Craigslist-Spawed Prostitution in Cook County.**

77. The Sheriff conducts stings through Craigslist regularly. However, the deluge of erotic services postings taxes its resources. The sheer number of daily postings has made it impossible to stymie Craigslist generated prostitution.

78. Since January of 2007, the Sheriff has arrested over 200 people through Craigslist on charges ranging from prostitution, juvenile pimping, and human trafficking.

79. The Sheriff arrested one woman on December 31, 2006 for pimping a

16-year-old girl on Craigslist. (See Associated Press article, *"Police Say Two Chicago Women Were Pimping Children"* January 12, 2007, attached as Exhibit P).

80. The Sheriff made another arrest a week later for the pimping of a 14-year-old girl on Craigslist. That arrest also netted nine weapons and ninety grams of crack cocaine. (See Exhibit P).

81. In December of 2007, the Sheriff conducted a sting that resulted in the arrests of four men charged with running a prostitution ring through Craigslist. (See Chicago Tribune article, *"10 Charged in Internet Prostitution; Illinois, Indiana Ring Placed Ads on Craigslist"* December 22, 2007, attached as Exhibit Q).

82. The ring involved eleven women, some of whom were high school freshman and sophomores.

83. The Sheriff conducted another sting in the summer of 2008 that resulted in the arrest of 76 people on prostitution-related charges in a crackdown aimed at Craigslist. (See Chicago Tribune article, *"76 Arrested in Craigslist Sting Project"* June 16, 2008, attached as Exhibit R).

84. The Sheriff's stings typically target several fronts. Undercover male Sheriff's officers pose as customers, arranging meetings with women featured in erotic services ads. Once an offer of sex for money is made, the offender is taken into custody.

85. In two such cases, Sheriff's officers arrested women at local hotels and found that each prostitute had rented a second room where they left their children unattended while they met with patrons. One woman left a 1-year-old and 4-year-old

alone in the second room, and another woman left a 2-year-old and a 4-year-old unattended. (See Exhibit R).

86. On another occasion, Sheriff's officers responded to a Craigslist post that featured a nude photograph of a 16-year-old girl. The girl was forced into prostitution by two men who were later charged with involuntary servitude of a minor and prostitution pandering. (See Chicago Tribune article, "*2 Men Prostituted Teen, Police Say*," November 9, 2008, attached as Exhibit S).

87. Sheriff's officers have also posted fake advertisements in erotic services. One advertisement, which clearly indicated a 15-year-old girl was looking for sex and would accept money, received three responses. One response was traced to a registered sex offender who had previously been arrested by the Sheriff. (See Exhibit R).

88. A second advertisement posted by the Sheriff featured a fictitious 14-year-old girl looking for a boyfriend, which Defendant never removed.

89. Prostitution in Cook County is not relegated to the City of Chicago. It is endemic in the suburbs as well, especially those adjacent to O'Hare airport. For example, one Des Plaines police officer explained "at this moment there are 55 people alone selling sex in Des Plaines on Craigslist." (See Chicago Tribune article, "*Prostitutes Use Web as New 'Street Corner'*" September 13, 2006, attached as Exhibit T).

90. Chicagoland suburbs have also been the scene of arrests for juvenile pimping through Craigslist. (See news articles attached as Exhibit U).

91. The Sheriff has netted offenders on various charges through Craigslist.

92. There have been arrests for human trafficking, juvenile pimping, and child endangerment. (See arrest reports attached as Exhibit V).

93. These arrests are the results of the Sheriff's constant surveillance of Craigslist's erotic services.

94. These experiences prompted pleas from the Sheriff to Defendant to close Craigslist's erotic services. The Sheriff publicly called erotic services a "free advertising network for prostitutes and pimps." (See Exhibit Q).

95. The Sheriff also sent five separate letters to Defendant seeking erotic services' closure between September 2007 and May 2008. Defendant declined. (See letters attached as Exhibit W).

96. Defendant's refusal to close or regulate erotic services has left the Plaintiffs with only legal recourse to combat this proliferation of prostitution.

### CAUSES OF ACTION

#### Count I - Public Nuisance

97. The Plaintiffs reallege paragraphs 1 through 96 of this Complaint and incorporate them herein.

#### **A. Defendant's Creation of the Nuisance.**

98. Cook County residents have a common right to be free from conduct that injures the public's health, safety, peace, and welfare. The residents also have the right to be free from conduct that creates a disturbance to person and property.

99. Prostitution epitomizes public nuisance. Facilitating it is no less a nuisance.

100. Defendant knowingly and intentionally facilitates prostitution through Craigslist's erotic services forum, its twenty-one categories, and the word search function.

101. Defendant invites and solicits the illegal conduct through its own communications, namely, its creation of the erotic services forum, the twenty-one categories, and the word search function.

102. Defendant knows the erotic services advertisements are used by individuals seeking prostitutes.

103. Defendant knows the erotic services advertisements leads to prostitution.

104. The link between Craigslist and prostitution arrests in Cook County is clear. Defendant's conduct in creating erotic services, developing twenty-one categories, and providing a word search function for Cook County residents enables prostitution.

105. Defendant's proliferation of prostitution results in crime, disease, drug abuse, and child endangerment, leading to a higher level of discomfort and danger to Cook County residents. It further necessitates the expenditures of tax dollars to combat these ills.

106. Defendant's conduct in creating erotic services, developing twenty-one categories, and providing a word search function causes a significant interference with the public's health, safety, peace, and welfare. It further undermines the community's



ability to be free from dangers to person and property. Thus, there is a substantial and unreasonable interference with rights common to the general public.

107. Additionally, facilitating prostitution is proscribed by federal, state, and local law. Violating such provisions is evidence Defendant's conduct is a nuisance.

**B. 720 ILCS 5/11-15 - Soliciting for a Prostitute.**

108. Under 720 ILCS 5/11-15, one who "arranges or offers to arrange a meeting of persons for the purpose of prostitution, or directs another to a place knowing such direction is for the purpose of prostitution" is soliciting for a prostitute. Soliciting for a prostitute is a Class A misdemeanor

109. Craigslist's erotic services offers to arrange and does arrange meetings of persons for the purpose of prostitution.

110. Craigslist invites posts for erotic services and then enables users to search based on their preferences.

111. Craigslist directs users of erotic services to places of prostitution knowing such direction is for prostitution.

112. The erotic services forum, its twenty-one categories, and the search function represent affirmative acts taken by Defendant that facilitate meetings of persons for prostitution.

113. Defendant cannot claim ignorance as the Sheriff has asked Defendant to close erotic services and has provided Defendant with evidence of the rampant prostitution and juvenile pimping arrests via Craigslist.

114. Craigslist facilitates the liaisons between prostitute and patron. Erotic services is the *sine qua non* of the arrangement.

115. Defendant's participation is sufficient under 720 ILCS 5/11-15 because the law was designed "to deter passive co-operation by persons who have, perhaps only an indirect connection with the trade." (720 ILCS 5/11-15, Committee Comments, at 342).

116. Defendant has violated and continues to violate 720 ILCS 5/11-15.

117. Defendant's violation of 720 ILCS 5/11-15 is evidence its conduct is a nuisance.

**C. Chicago Municipal Code 8-8-020 - Directing Persons to Houses of Ill-Fame.**

118. Additional evidence Defendant's conduct is a nuisance is its violation of Section 8-8-020 of the Chicago Municipal Code.

119. Section 8-8-020 of the Chicago Municipal Code provides, in part, that "no person knowingly shall direct, take, transport, or offer to direct, take, or transport, any person for immoral purposes to any other person, or assist any person by any means to seek or to find any prostitute."

120. Craigslist's erotic services directs users to prostitutes and brothels by providing the location of prostitutes and brothels.

121. Craigslist's erotic services assists users in finding prostitutes and brothels by providing the contact information of prostitutes and brothels.

122. Craigslist's erotic services also assists users in finding prostitutes by streamlining the search process. It allows users to search the section based on sexual proclivity, physical dimensions, price range, and location.

123. Craigslist's erotic services provides a forum for prostitutes to advertise their attributes and the sexual acts they will perform.

124. Craigslist's erotic services provides a forum for prostitutes and brothels to provide their location and contact information.

125. Craigslist prompts the illegal activity by creating a forum for the specific purpose of prostitution. Craigslist invites pimps, prostitutes, and sex-oriented businesses to post their services in an accessible and convenient place.

126. Defendant has been rebuked in the national media for facilitating prostitution. The national attention devoted to Defendant's facilitation of prostitution is evidence that Defendant knows erotic services directs users to prostitutes.

127. Defendant's conduct has violated and continues to violate Section 8-8-020 of the Chicago Municipal Code.

128. Section 8-8-020 mandates that violators "shall be fined not less than \$100.00 nor more than \$400.00 for each offense."

129. Defendant's violation of Section 8-8-020 of the Chicago Municipal Code is evidence its conduct is a nuisance.

**D. 18 U.S.C.S. § 1952 (a) (3) - Transportation in Aid of Racketeering Enterprises.**

130. A final example that Defendant's conduct is a nuisance is that it runs afoul

of 18 U.S.C.S. § 1952.

131. Section 1952 prohibits the use of the mail or any facility in interstate commerce, with intent to “promote, manage, establish, carry on, or facilitate the promotion, management, establishment, or carrying on, of any unlawful activity.”

132. “Unlawful activity” under Section 1952 includes “prostitution offenses in violation of the laws of the State in which they are committed.”

133. Defendant uses the mail and Internet in interstate commerce in connection with Craigslist and erotic services.

134. Craigslist’s erotic services facilitates, enables, and permits the dissemination of materials that aid individuals in procuring prostitution services.

135. Craigslist’s erotic services advertisements propose illegal commercial activity under local and state law and can thus be regulated and suppressed.

136. Defendant is responsible in part for the creation of the offending content. Its website induces users to post prostitution related advertisements in erotic services.

137. Defendant’s creation of erotic services, the twenty-one categories, and the search function makes it more than a passive transmitter of information provided by others.

138. Thus, Defendant promotes unlawful activity, to wit, prostitution. In so doing, Defendant violates state and local laws relating to prostitution, Chicago Municipal Code Section 8-8-020 and 720 ILCS 5/11-15, and public nuisance.

139. Defendant facilitates the carrying on of unlawful activity, to wit, prostitution. In so doing, Defendant violates state and local laws relating to prostitution, Chicago Municipal Code Section 8-8-020 and 720 ILCS 5/11-15, and public nuisance.

140. Defendant's violation of 18 U.S.C.S. § 1952 is evidence that its conduct is a nuisance.

141. Thus, as evinced by Chicago Municipal Code Section 8-8-020, 720 ILCS 5/11-15, and 18 U.S.C.S. § 1952, Defendant's conduct contravenes prohibitions on prostitution.

142. Violating such provisions constitutes an unreasonable interference with a public right.

**E. Defendant Knowingly Facilitates Prostitution.**

143. Defendant's conduct creates an ongoing nuisance as posts for prostitution are continuously made in erotic services and arrests invariably follow.

144. Defendant knows its conduct has an ongoing detrimental effect upon the public's health, safety, and welfare, and the community's right to be free from disturbance.

145. There is a reasonable certainty Defendant's acts injured and continue to injure the public's health, safety, and welfare.

146. Craigslist's erotic services spawns the numerous stings and concomitant arrests in Cook County.

147. Plaintiffs attribute the surge in prostitution arrests to the popularity and accessibility of Craigslist's erotic services.

148. Craigslist's erotic services is a substantial factor in bringing about injuries to the public because it streamlines the prostitution process. Erotic services is considered convenient, discreet, and legitimate by patrons and prostitutes alike.

149. It was foreseeable to Defendant that prostitution would be a likely result where it created a section named "erotic services" and designated twenty-one categories based on sexual preference. A reasonable person would understand that creating the erotic services section would lead to sexual favors for money.

150. Defendant's conduct is the direct and proximate cause of injuries to Cook County residents: it interferes with their public safety, health, and the quality of life.

151. Defendant's facilitation of prostitution will continue to threaten the health, safety, and welfare of the County's residents. The Sheriff has a clearly ascertainable right to abate conduct that perpetuates such harm.

152. This public nuisance constitutes an injury in fact to the Sheriff and Cook County residents that is concrete and particularized, actual and imminent, and caused by Defendant.

153. Defendant's facilitation of prostitution proximately results in significant costs to the Sheriff and Cook County in enforcing prostitution laws and treating the social, health, and psychological damage wrought by prostitution, trafficking, and child endangerment.

154. The Sheriff and Cook County must also prosecute those who have been charged with prostitution through Craigslist, fund the criminal justice system in which such prosecutions take place, and detain those culprits.

155. WOPAA and Dreamcatcher have expended significant sums in rehabilitating former prostitutes. This includes providing temporary housing, long term housing, job training, and physical and mental health care. These funds would not be expended if forums such as Craigslist did not facilitate prostitution.

156. Defendant could reasonably eliminate its creation of this nuisance by simply removing erotic services. The costs of this step is negligible compared to the costs of harm that would be avoided.

WHEREFORE, the Plaintiffs request the Court declare Defendant, Craigslist, Inc.'s conduct a nuisance, award the Plaintiffs costs incurred through this nuisance, and award compensatory and punitive damages.

#### **Count II-Declaratory and Injunctive Relief**

157. The Plaintiffs reallege paragraphs 1 through 156 of this Complaint and incorporate them herein.

158. Pursuant to 28 U.S.C. § 2201, the Court "may declare the rights and other legal relations of any interested party seeking such declaration, whether or not further relief is or could be sought."

159. As set forth above, Defendant's conduct constitutes a public nuisance and will continue to be in the future.

160. Enjoining Defendant from committing this conduct in the future is appropriate. The Sheriff has no adequate remedy at law and will suffer irreparable harm in the absence of the Court's declaratory and injunctive relief.

161. Monetary damages will not adequately compensate the Sheriff for the harm he will continue to suffer if Defendant's conduct continues. Moreover, the harm to the safety, health, and welfare of Cook County residents in the absence of an injunction is irreparable. Thus, a permanent injunction is necessary.

WHEREFORE, the Plaintiffs request trial by jury and that the Court grant judgment for the Plaintiffs and against Defendant, Craigslist, Inc., as follows:

- A. Find Craigslist, Inc. liable for creating a public nuisance;
- B. Issue a permanent injunction enjoining Craigslist, Inc. from engaging in the conduct complained of herein;
- C. Order Craigslist, Inc. to comply with federal, state, and municipal laws related to facilitating prostitution;
- D. Award compensatory and punitive damages in an amount to be determined at trial;
- E. Retain jurisdiction of this case until such time as it is assured that Craigslist, Inc. has remedied the unlawful conduct complained of herein and is determined to be in full compliance with the law;
- F. Award costs incurred through the nuisance, and
- G. Award such other relief as the Court may deem just or equitable.



Respectfully submitted,

The Sheriff of Cook County

By: s/ Daniel F. Gallagher  
One of the Sheriff's Attorneys

Dan Gallagher  
Paul O'Grady  
Querrey & Harrow, Ltd.  
175 West Jackson Blvd.  
Suite 1600  
Chicago, IL 60604  
(312) 540-7000

By: s/Kaethe Morris Hoffer  
Legal Director  
Justice Project Against Sexual Harm  
Chicago Alliance Against Sexual Exploitation  
3304 N. Lincoln Ave., 2nd floor  
Chicago, Illinois 60657  
Phone: 773/244-2230 Ext. 2

# **EXHIBIT A**

# craigslist

## chicago chc nch wcl sox nwi nwc

- post to classifieds
- my account
- help, faq, abuse, legal
- search craigslist

for sale

event calendar

S	M	T	W	T	F	S
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
1	2	3	4	5	6	7

- avoid scams & fraud
- personal safety tips
- craigslist blog
- craigslist factsheet
- best-of-craigslist
- job boards compared
- craigslist movie & dvd
- craigslist T-shirts
- craigslist foundation
- defend net neutrality
- system status
- terms of use privacy
- about us help

- community**
- activities lost+found
  - artists musicians
  - childcare local news
  - general politics
  - groups rideshare
  - pets volunteers
  - events classes
- housing**
- apts / housing
  - rooms / shared
  - sublets / temporary
  - housing wanted
  - housing swap
  - vacation rentals
  - parking / storage
  - office / commercial
  - real estate for sale

- personals**
- strictly platonic
  - women seek women
  - women seeking men
  - men seeking women
  - men seeking men
  - misc romance
  - casual encounters
  - missed connections
  - rants and raves

- discussion forums**
- 1099 gifts pets
  - apple haiku philos
  - arts health politic
  - atheist help psych
  - autos history queer
  - beauty housing recover
  - bikes jobs religion
  - celebs jokes rofo
  - comp kink science
  - crafts l.t.r. shop
  - diet legal spirit
  - divorce linux sports
  - dying loc pol t.v.
  - eco m4m tax
  - educ money testing
  - etiquet motocy transg
  - feedbk music travel
  - film npo vegan
  - fitness open w4w
  - fixit outdoor wed
  - food over 50 wine
  - frugal p.o.c. women
  - gaming parent words
  - garden pefo writers

- for sale**
- barter arts+crafts
  - bikes auto parts
  - boats baby+kids
  - books cars+trucks
  - business cds/dvd/vhs
  - computer clothes+acc
  - free collectibles
  - furniture electronics
  - general farm+garden
  - jewelry games+toys
  - material garage sale
  - rvs household
  - sporting motorcycles
  - tickets music instr
  - tools photo+video
  - wanted

- services**
- beauty automotive
  - computer household
  - creative labor/move
  - erotic skill'd trade
  - event real estate
  - financial sm biz ads
  - legal therapeutic
  - lessons travel/vac
  - write/ed/tr8

- jobs**
- accounting+finance
  - admin / office
  - arch / engineering
  - art / media / design
  - biotech / science
  - business / mgmt
  - customer service
  - education
  - food / bev / hosp
  - general labor
  - government
  - human resources
  - internet engineers
  - legal / paralegal
  - manufacturing
  - marketing / pr / ad
  - medical / health
  - nonprofit sector
  - real estate
  - retail / wholesale
  - sales / biz dev
  - salon / spa / fitness
  - security
  - skilled trade / craft
  - software / qa / dba
  - systems / network
  - technical support
  - transport
  - tv / film / video
  - web / info design
  - writing / editing
  - [ETC] [part time]

- gigs**
- computer event
  - creative labor
  - crew writing
  - domestic talent
  - adult

resumes

us cities	us states	countries
atlanta	alabama	argentina
austin	alaska	australia
boston	arizona	austria
chicago	arkansas	bangladesh
dallas	california	belgium
denver	colorado	brazil
houston	connecticut	canada
las vegas	dc	caribbean
los angeles	delaware	chile
miami	florida	china
minneapolis	georgia	colombia
new york	guam	costa rica
orange co	hawaii	czech repub
philadelphia	idaho	denmark
phoenix	illinois	egypt
portland	indiana	finland
raleigh	iowa	france
sacramento	kansas	germany
san diego	kentucky	great britain
seattle	louisiana	greece
sf bayarea	maine	hungary
wash dc	maryland	india
more ...	mass	indonesia
	michigan	ireland
	minnesota	israel
canada	mississippi	italy
	missouri	japan
calgary	montana	korea
edmonton	n carolina	lebanon
halifax	n hampshire	malaysia
montreal	nebraska	mexico
ottawa	nevada	micronesia
toronto	new jersey	netherlands
vancouver	new mexico	new zealand
victoria	new york	norway
winnipeg	north dakota	pakistan
more ...	ohio	panama
	oklahoma	peru
intl cities	oregon	philippines
amsterdam	pennsylvania	poland
bangalore	puerto rico	portugal
bangkok	rhode island	russia
barcelona	s carolina	singapore
berlin	south dakota	south africa
buenosaires	tennessee	spain
hongkong	utah	sweden
london	texas	switzerland
manila	vermont	taiwan
mexico	virginia	thailand
paris	washington	turkey
riodejaneiro	west virginia	UAE
rome	wisconsin	UK
shanghai	wyoming	US
sydney		venezuela
tokyo		vietnam
zurich		

## **EXHIBIT B**

# craigslist

# chicago

more cities

post to classifieds

help subscriptions

search craigslist

community  

event calendar (88)

S	M	T	W	T	F	S
<a href="#">12</a>	<a href="#">13</a>	<a href="#">14</a>	<a href="#">15</a>	<a href="#">16</a>	<a href="#">17</a>	<a href="#">18</a>
<a href="#">19</a>	<a href="#">20</a>	<a href="#">21</a>	<a href="#">22</a>	<a href="#">23</a>	<a href="#">24</a>	<a href="#">25</a>
<a href="#">26</a>	<a href="#">27</a>	<a href="#">28</a>	<a href="#">29</a>	<a href="#">30</a>	<a href="#">31</a>	<a href="#">1</a>
<a href="#">2</a>	<a href="#">3</a>	<a href="#">4</a>	<a href="#">5</a>	<a href="#">6</a>	<a href="#">7</a>	<a href="#">8</a>

best-of-craigslist

craig blog new

craigslist T-shirts

craigslist in the news

teachers' wishlists

craigslist foundation

terms of use your privacy

about us contact us

© 2003 craigslist

community (1794)

- activity partners
- artists lost+found
- childcare musicians
- general politics
- groups rideshare
- pets volunteers
- events classes

personals (5270)

- women seek women
- women seeking men
- men seeking women
- casual encounters
- men seeking men
- missed connections
- rants and raves

discussion forums

- |                |                |                |
|----------------|----------------|----------------|
| <u>arts</u>    | <u>jobs</u>    | <u>po</u>      |
| <u>autos</u>   | <u>kink</u>    | <u>politic</u> |
| <u>beauty</u>  | <u>legal</u>   | <u>psych</u>   |
| <u>comp</u>    | <u>loc pol</u> | <u>queer</u>   |
| <u>educ</u>    | <u>m4m</u>     | <u>rofo</u>    |
| <u>fdbk</u>    | <u>mc</u>      | <u>selfem</u>  |
| <u>film</u>    | <u>money</u>   | <u>shop</u>    |
| <u>fitness</u> | <u>music</u>   | <u>spirit</u>  |
| <u>fixit</u>   | <u>night</u>   | <u>sports</u>  |
| <u>food</u>    | <u>open</u>    | <u>testing</u> |
| <u>gaming</u>  | <u>outdoor</u> | <u>transit</u> |
| <u>garden</u>  | <u>parent</u>  | <u>travel</u>  |
| <u>haiku</u>   | <u>pefo</u>    | <u>w4w</u>     |
| <u>health</u>  | <u>peis</u>    | <u>women</u>   |
| <u>housing</u> | <u>philos</u>  | <u>writers</u> |

housing (4380)

- apts / housing
- rooms / shared
- sublets / temporary
- housing wanted
- housing swap
- vacation rentals
- parking / storage
- office / commercial
- real estate for sale

for sale (6851)

- barter cars+trucks
- bikes clothes+acc
- books collectibles
- free computer
- furniture electronics
- general garage sales
- sporting household
- tickets motorcycles
- wanted music instr

services (2114)

- computer household
- creative labor/haul
- erotic sm biz ads
- event skill'd trade
- lessons therapeutic

jobs (1097)

- accounting / finance
- admin / office
- art / media / design
- biotech / science
- business / mgmt
- customer service
- education / teaching
- engineering / arch
- human resources
- internet engineering
- legal / government
- marketing / pr / adv
- medical / healthcare
- nonprofit sector
- retail / food / hosp
- sales / biz dev
- skilled trade / craft
- software / qa / dba
- systems / networks
- technical support
- tv / film / video
- web / info design
- writing / editing
- et cetera jobs
- part time
- resumes (351)

# EXHIBIT C

craigslist > erotic services > warning & disclaimer

Unless all of the following points are true, please use your "back" button to exit this part of craigslist:

1. I am at least 18 years old.
2. I understand "erotic services" may include adult content.
3. I agree to flag as "prohibited" anything illegal or in violation of the craigslist terms of use. This includes, but is not limited to, offers for or the solicitation of prostitution.
4. I agree to report suspected exploitation of minors to the appropriate authorities.
5. By clicking on the links below, I release craigslist from any liability that may arise from my use of this site.

Human trafficking and exploitation of minors are not tolerated - any suspected activity will be reported to law enforcement.

erotic services >>>>> w4m m4m m4w w4w t4m m4t  
mw4mw mw4w mw4m w4mw m4mw w4ww m4mm mm4m ww4w ww4m mm4w m4ww w4mm t4mw mw4t

For those interested there is background information available about the "erotic services" category

Choosing safer sex for you and your partner greatly reduces the risk of contracting STDs including HIV -- you can get answers to your safer sex questions, courtesy of staff members at the SF city clinic

craigslist has implemented the PICS content labeling system to assist parents and others who may be interested in content filtering. The PICS system is compatible with most commercially available as well as open source content control software packages.

# **EXHIBIT D**



**KLAASKIDS FOUNDATION**  
NATIONAL SEARCH CENTER FOR  
MISSING & TRAFFICKED CHILDREN  
312 E. NINE MILE RD., SUITE 20 PMB414  
PENSACOLA, FL 32514  
WEBSITE: [www.klaaskids.org](http://www.klaaskids.org)

# INDICATIONS & WARNING TRAFFICKING INTELLIGENCE FUSION CENTER REPORT

A mile a minute....  
*that is how fast your child can disappear*

NATIONAL SEARCH CENTER FOR MISSING & TRAFFICKED CHILDREN

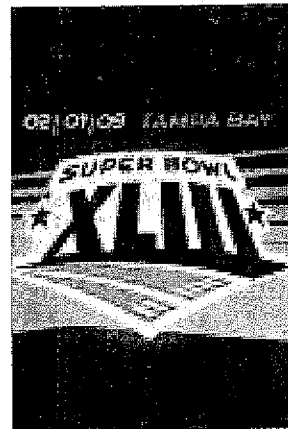
## Super Bowl of Sex Trafficking

### Tackle the Traffickers

Anytime a major event such as the Super Bowl comes into town, a massive influx of tourists, money, and a no holds barred party atmosphere attract the prostitution scene.

In an effort to combat the inevitable proliferation of child prostitution the KlaasKids Foundation and the Florida Coalition Against Human Trafficking (FCAHT) teamed up to conduct an all-out blitz against sex trafficking during the Super Bowl in Tampa, Florida.

**Operation: Tackle the Traffickers** included more than 45 volunteers who targeted hotels, restaurants, gas stations and other businesses in Tampa, St. Petersburg and Clearwater during Super Bowl weekend. Morgan Dennis of the KlaasKids Foundation supplied the majority of the intelligence reporting during the event. Her analysis was conducted on-line using Craigslist as well as several other websites used by providers and customers. Areas that were targeted were selected based upon intelligence analysis derived from the Internet.



FCAHT event organizer Giselle Rodriguez recruited volunteers from the local Human Trafficking Coalition and several colleges. She compiled an enormous amount of anti-trafficking literature that outreach workers then supplied to business owners prior to the Super Bowl. Outreach workers received a tremendous response from the business owners. Several of the hotel managers requested follow-up training for their staff so that in the future they would be able to better identify sex trafficking. More importantly, the outreach effort developed several leads regarding the sex trafficking of minors.

*(Continued on Page 4)*

Many of our readers have asked us questions regarding the types of cases that KlaasKIDS Foundation is involved in.

Below is a brief peak into the inner workings of the KlaasKIDS Foundation during the period of this report – January 24 – February 7.

Staff and volunteers were involved in the Human Trafficking Outreach "Tackle the Trafficker" in Tampa, Florida.

Our volunteer search and rescue team was involved in two separate missing person cases:

- ◆ Assisted in the successful recovery of Alzheimer's patient in Destin, Florida;
- ◆ Assisted in the search for a homicide victim in Atmore, Alabama.

Our staff assisted the family of a missing 16 year-old girl from Michigan who was lured to Puerto Rico by a 26 year-old man.

Our staff assisted investigators involved in the cold case investigation of a missing 14 year-old from Florida.

(Continued on Page 5)

### Super Defense – Tampa Law Enforcement



Area law enforcement agencies including the Tampa Police Department and the Hillsborough County Sheriff's Department conducted numerous sting operations during the days leading up to the Super Bowl. Their efforts produced impressive results.

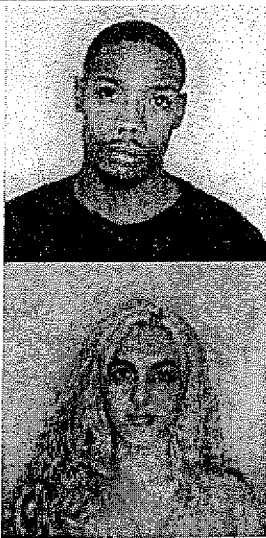
Law enforcements efforts to squash the proliferation of prostitution were apparent everywhere we looked. Street prostitution along popular tracks like Dale Mabry and Nebraska Ave were nonexistent. Customers

using the popular website [www.usasexguide.info](http://www.usasexguide.info) constantly updated their special thread to discuss the oppressive law enforcement presence.

01-27-09 at 01:30	#43
<b>Oldcenturion</b> Regular Member Reports: 5	<b>Increased LEO Activities</b> I can't recall which TV news I heard this on today but they mentioned that the LEO units would be using "attractive decoys" during night actions. They interviewed a rather gruff looking LEO captain who stated they have noticed a big increase in Craigslist ads and would take action.  Stay safe out there guys.  Regards, the Old Centurion

Sting operations focused on street prostitution, strip clubs and massage parlors during the days leading up to the big game. On Monday, January 26<sup>th</sup> their operations netted 13 arrests. On Thursday, January 29<sup>th</sup> they had added an additional 19 arrests. By Friday night potential customers were hard pressed to find any street prostitution in Tampa.■

© 2008 by the KlaasKids Foundation. *Indications & Warning Trafficking Intelligence Fusion Center Report* is published monthly for Foundation members. Dedicated to the memory of Polly Klaas, the Foundation's purpose is to inform parents, children and communities about how to prevent crimes against children through personal action and support of legislation. Editorial: Brad Dennis, Director of KlaasKids Foundation National Search Center for Missing & Trafficked Children. Design Concept: Blackburn Design, Petaluma, CA. Printing: MSI Litho, San Rafael, CA.



### Pair Sacked at Super Bowl with Profiting from the Prostitution of a Juvenile

Pasquale Holt, 23, and Erica Licata, 19 were charged with felony prostitution, and accused of using a 17-year-old girl for sex.

Licata, who listed her employer as Platinum Showgirls according to jail records, is also charged with procuring a person under 18 for prostitution, a felony, and offering to commit prostitution, a misdemeanor.

According to affidavits, the Hillsborough County Sheriff's Office arrested the three on Cypress Avenue in Tampa on January 26<sup>th</sup> around 11:50pm. Licata and the 17-year-old offered an undercover deputy oral sex in exchange for \$300. Affidavits state that Holt was expected to be compensated \$300 for driving the two to the location. ■

### Our Monitoring of Craigslist Activity during the Super Bowl

CRAIGSLIST ACTIVITY - TAMPA SUPER BOWL			
January	# of Daily Ads	# of Ads for 18 to 20yo	High Risk Trafficking Indicators
1	87	6	
2	86	12	High Risk Trafficking Indicators (HRTI's) are key words or features used in online ads that typically signify minors or trafficking situations.
3	84	7	
4	73	6	
5	85	7	
6	69	8	Examples of HRTI's found on Tampa Craigslist January 1 - February 1, 2009
7	91	10	
8	104	13	"New to Craigslist"
9	104	15	"First time on here"
10	112	12	"New to business"
11	88	10	"New to Tampa"
12	121	10	"New to town"
13	106	12	"Virgin, Virgin, Virgin"
14	112	7	"Young and Fresh"
15	117	17	"New Girl"
16	115	13	"Break her in"
17	114	7	
18	111	13	
19	123	14	Ads with out-of-state phone numbers
20	129	15	Ads offering 2 girl specials
21	139	19	Ads featuring multiple girls
22	120	27	
23	118	26	
24	124	24	
25	128	23	
26	133	27	
27	156	27	
28	153	29	
29	174	31	
30	177	30	
31	196	35	

**Example of the transitory nature of trafficking during the Super Bowl:**

The Craigslist advertisements below show Angel and her friends advertising in Detroit the week prior to the Super Bowl and then show her again in Tampa during the Super Bowl.

Advertisements of girls on Craigslist indicated travel from around the country including ads from Washington, DC, New York, Detroit, Atlanta, Las Vegas, California and Hawaii.

**DOUBLE THE FUN- w4m - 21 (SOUTHFIELD/ DETRIOT)\* Internal error: Invalid file format. | In-line.WMF \***

Reply to: [pers-1007179610@craigslist.org](mailto:pers-1007179610@craigslist.org) [2]

Date: 2009-01-25, 2:49PM EST

\*\*\*\*\*ANGEL\*\*\*\*\*

HI GUYS I'M NEW TO THE LIST!  
BUT MY GIRLFRIEND AMANDA ISNT!



ARE YOU READY FOR THE EXPERIENCE OF A LIFETIME?  
WERE DOING IN AND OUTCALL ALL NIGHT LONG!!!

CALL US WHEN YOU NEED US!!! ---313---523---8423---  
SINGLE RATES:---HH....100---H.....190.---

\*CALL FOR OUT CALL AND DOUBLE RATES!

**GET READY FOR THE BIG GAME WITH ME! - w4m - 23 (DOWNTOWN TAMPA)**

Reply to: [pers-1016133000@craigslist.org](mailto:pers-1016133000@craigslist.org) [2]

[1016133000@craigslist.org](mailto:1016133000@craigslist.org) [2]

Date: 2009-02-01, 5:57AM EST

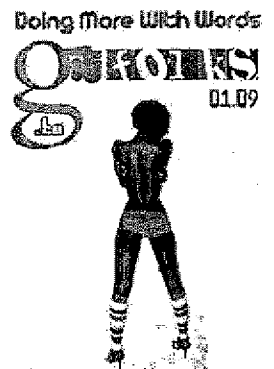
\*\*\*\*\*ANGEL\*\*\*\*\*



---313---289---7104--- CALL AND ASK ABOUT MY GIRLFRIENDS AMANDA AND HEIDE, AND FOR OUTCALL RATES ---HH.....125--- H.....225

**GOT FOLKS.COM**

Got Folks.com originated in 2006 but didn't really come on the scene until October 2008. This website and its on-line magazine are growing in recognition and feature a series of on-line chat connections using the popular "chat-n-go" system.



The magazine recently announced its growing popularity within the sex industry community by launching a new look on its website with added features. One feature that caught our interest is the upcoming launch of Got Folks.TV. This new addition will feature video shot within the sex industry.

Got Folks.Com was actively advertising its website in several locations, including Tampa's Craigslist during the Super Bowl. ■

**Super Bowl of Sex Trafficking**

*(Continued from Page 1)*

Each of these leads were turned over to law enforcement authorities.

Ms. Rodriguez efforts were instrumental in the success of the program. Plans are already in progress for next year's Super Bowl in Miami, Florida. ■

For more information about the Florida Coalition Against Human

Trafficking please go to their website at: [www.stophumantrafficking.org](http://www.stophumantrafficking.org).



(Continued from Page 2)

Marc Klaas, our founder, wrote an editorial regarding child safety and appeared on the Nancy Grace show to comment on current missing child cases.

Our partner organization, Beyond Missing was responsible for providing digital and print Amber Alert flyers for a child in Texas and missing posters for the child in Puerto Rico.

\*\*\*\*\*

The KlaasKIDS Foundation would like to thank the following groups for the successful "Tackle the Trafficker" Super Bowl outreach.

**Florida Coalition  
Against  
Human Trafficking**

\*\*\*\*\*

**Eden Fellowship  
Church  
of Pensacola, Florida**

\*\*\*\*\*

**Salvation Army,  
Tampa**

\*\*\*\*\*

**Santokiproductions**

# MISSING



<b>Date Missing:</b>	9/29/2008	<b>County:</b>	PINELLAS
<b>Missing From:</b>	Clearwater, FL	<b>Age Disappeared:</b>	16 yrs 8 months
<b>Birth Date:</b>	1/9/1992	<b>Sex:</b>	Female
<b>Race:</b>	White	<b>Weight:</b>	129
<b>Height:</b>	5' 05"	<b>Eyes:</b>	Brown
<b>Hair:</b>	Brown	<b>Narrative:</b> Samantha was last seen wearing black jeans and a white tee shirt. She has multiple tattoos.	

If you have any information concerning the whereabouts of this child, please contact the Clearwater Police Department at 727-562-4200 or the FDLE MISSING ENDANGERED PERSONS INFORMATION CLEARINGHOUSE at 1-888-FL MISSING [Internet: http://www.fdle.state.fl.us](http://www.fdle.state.fl.us)

"Tackle the Traffickers" outreach workers uncovered several valuable leads concerning Samantha Walker, these leads were turned over to law enforcement authorities.

Samantha was last seen in the Clearwater, Florida area.  
Help us find this missing child.

# **EXHIBIT E**

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# ASIAN S.E.X KITTIN - w4m - 23 (OHARE AIRPORT)

Reply to: [pers-1005312414@craigslist.org](mailto:pers-1005312414@craigslist.org) 

Date: 2009-01-23, 9:53PM CST

For a total mind b.l.o.w.i.n.g expeiance, give me a call...  
Cinnamon (909) :-



- Location: OHARE AIRPORT
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1005312414

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~•□•~STUNNING~•□•~SEXY~•□•~SOPHISTICATED~•□•~ -  
w4m - 27 (Chicago/sur areas)

Reply to: [pers-985562996@craigslist.org](mailto:pers-985562996@craigslist.org) 

Date: 2009-01-08, 6:20PM CST

°□□•°I'M READY TO PLAY°•□°□°

Allow me to satisfy your Sweet Tooth.

I will meet ALL your needs and exceed your expectations,

Giving you an experience that you will never forget

I am extremely Sexy, Sensual, and FUN!!!

NO GAMES,,,100%REAL PIC,,,100%INDEPENDENT.

I have a bubbly personality and love to have a kinky good time with deserving gentlemen.

So please... don't hesitate.

Pick up that phone and call now!!!!

In A hurry??

15 Min \$50 Roses

Wanna Have A Wild Time??

1hour \$150 Roses

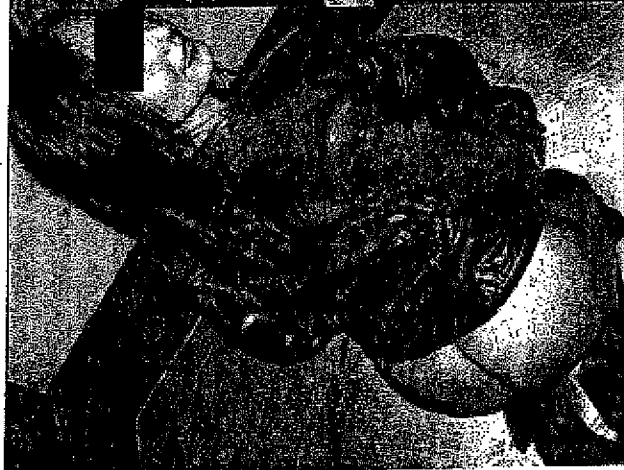
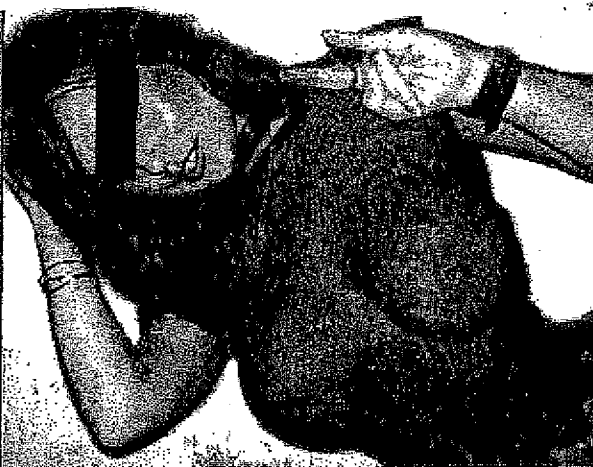
Ready To Get Naughty And Also Relax!!

Wanna Relax At your Own Home!!

same Roses 4 Outcall

How About A G-R-E-E-K Lesson I'm A Great Student!!





- Location: Chicago/sur areas
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 985562996

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## Spend the night with me - w4m

Reply to: [pers-1003753366@craigslist.org](mailto:pers-1003753366@craigslist.org) <sup>[1]</sup>

Date: 2009-01-22, 6:42PM CST

Hey Gentlemen If sweetness is what you're looking for than look no further I'm the ultimate girl next door that you've always been fantasizing about I love to tease but aim to please My classy sex appeal and stunning beauty will initially attract you by spontaneous wild side and erotic nature are sure to captivate your full attention for as long as you can handle My ultimate goal is to leave you smiling for days addicted to my touch with your mind bulging with thoughts of me With a tight curvy figure silky smooth skin and captivating brown eyes I'm sure your every sense will be pleased by my erotic looks tempting touch and sweet seductive smell Your search for the perfect down-to-earth beauty ends here call jessica at 630-



- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1003753366

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<a href="#">spam/overpost</a>
<a href="#">best of craigslist</a>

**---YOUNG---TIGHT---&---JUST---RIGHT---4---YOU--- - w4m - 18 (Exit I-94 Old Orchard Rd:SKOKIE, IL)**

Reply to: [pers-1010719152@craigslist.org](mailto:pers-1010719152@craigslist.org) <sup>[2]</sup>

Date: 2009-01-27, 11:14PM CST.

Hey Guys, its \*K\*I\*T\*O\*Y\* and I'm AVAILABLE NOW!!!  
 I'm truly every man's FANTASY!  
 I'm a 18 year old, 5'9", 120 pound, sweetheart with long black hair and adorable hazel eyes.  
 I have a TIGHT LITTLE BODY that'll keep you coming back for more!!!  
 I'm 110% THE REAL THING!!!  
 No scams, No gimmicks, No upselling, and most of all NO Rush Sessions.  
 Don't be shy guys, give me a call...  
 TO MAKE YOUR FANTASY COME TRUE, I'M THE GIRL FOR YOU!!!  
 You won't be disappointed, I guarantee it!!!

920

Ki Toy



- Location: Exit I-94 Old Orchard Rd:SKOKIE, IL
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1010719152


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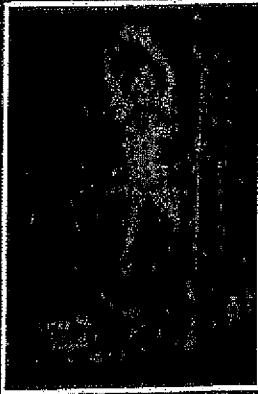
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**\*\*\*2 GIRLS\*\*\*BODIES OF SUPERSTARS\*\*\*SKILLS OF  
PORNSTARS\*\*\* - w4m (SCHAUMBURG  
INCALLS/OUTCALLS ALL OVER)**

- please flag with care:
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  - [spam/overpost](#)
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Reply to: [pers-1007165221@craigslist.org](mailto:pers-1007165221@craigslist.org)   
Date: 2009-01-25, 1:37PM CST

# The Beautiful Essence 312-



My mission and Pleasure is to Provide You with That Complete Erotic Sensual Encounter. Your experience with Me will be Unrushed, Passionate and Personalized for You, with Plenty of Time to Explore.

If You Love to be Pampered and Pleasured, then Indulge Yourself and Give me a Call. I Promise You Won't Regret It!

I'm an Independent Provider who Knows How to Treat a Man Like a King!!!!

Just sit back, relax and allow me to do the work.

I provide safe, sensual sessions with no rush.

Essence D'Sbeautiful  
312\*

I'm very openminded so don't be afraid to ask me anything.

For reviews and more pics check my website.

[www.EssenceTheBeautiful.ultraescort.com](http://www.EssenceTheBeautiful.ultraescort.com)

## Information

### CONTACT INFORMATION



### RATES

Rate: \$250.00 per hour  
Rate Details: \$100 Q\$200  
HH\$250 FH\$each Additional  
Hour Add \$100

## Profile

Service Area: Schaumburg  
Market Focus: Premium

Service Type: Erotic

## Attributes

### SPECIALTIES

- \*100% True GFE!
- Ask About My 2 Girl Specials!

### CREDENTIALS

- \* I Have Reviews On TER!

### BENEFITS OF SERVICE

- \* I Guarantee The Greatest EXXperience You've Ever Had!

### CLIENTS

- \* Respectful Gentlemen Only!

## Photo Gallery



Powered by uFlyer.com

VFLYER ID: 2169458

Photo Gallery



Description My mission and Pleasure is to Provide You with That Complete Erotic Sensual Encounter.  
Your experience with Me will be Unrushed, Passionate and Personalized for You, with Plenty of Time to Explore.  
If You Love to be Pampered and Pleasured, then Indulge Yourself and Give me a Call.  
I Promise You Wont Regret It!  
I'm an Independent Provider who Knows How to Treat a Man Like a King!!!!  
Just sit back, relax and allow me to do the work.  
I provide safe, sensual sessions with no rush.

Essence D'Beautiful  
312\* \*

I'm very openminded so don't be afraid to ask me anything.

For reviews and more pics check my website.

[www.EssenceTheBeautiful.ultraescort.com/Profile](http://www.EssenceTheBeautiful.ultraescort.com/Profile)

Service Area: Schaumburg

Service Type: Erotic

Market Focus: Premium

Powered by vFlyer.com vFlyer Id: 2169458

# KITTEN PURRS 312\*



A charming and elegant young lady with a passion for life. Romantic, witty, sensitive and emotional.  
 I am extremely feminine and passionate in anything I do.  
 I like to be affectionate and gentle and enjoy seducing and pampering the gentleman with my loving manners.  
 My sweet natured personality will have you falling in love.  
 Exotic and erotic with a beautiful sexy body, silky, smooth skin and a perfect bright smile.  
 I am most athletic, flexible and take excellent care of my body.  
 Most of all I love to play and my deep sensuality will more than satisfy you.  
 100% actual photo!!!!  
 Kitten Purrs  
 312\*  
[www.KittenPurrs.esorts.com](http://www.KittenPurrs.esorts.com)

## Information

### CONTACT INFORMATION



#### RATES

Rate: \$200.00 per hour  
 Rate Details: 100 Q150  
 HR200 FH

## Profile

Service Area: Schaumburg  
 Market Focus: Premium

Service Type: Erotic

## Attributes

### SPECIALTIES

- \* 100% GFE!
- \* Ask About My 2 Girl Specials With Essence O'Beautiful!

### CREDENTIALS

- \* I Have Reviews On TER!

### BENEFITS OF SERVICE

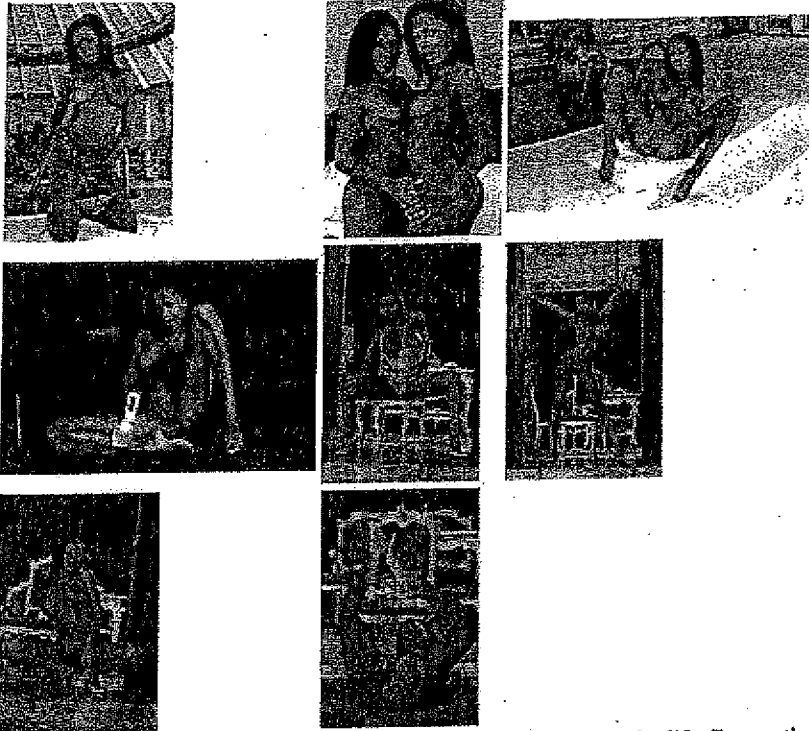
- \* The Ultimate Girl Friend Experience!

### CLIENTS

- \* Respectful Gentlemen Only!

## Photo Gallery





Description A charming and elegant young lady with a passion for life. Romantic, warm, sensitive and emotional. I am extremely feminine and passionate in anything I do. I like to be affectionate and gentle and enjoy seducing and pampering the gentleman with my loving manners. My sweet natured personality will have you falling in love. Exotic and erotic with a beautiful sexy body, silky, smooth skin and a perfect bright smile. I am most athletic, flexible and, take excellent care of my body. Most of all I love to play and my deep sensuality will more than satisfy you. 100% actual photo!!!!

Kitten Purrs

312\* \* \*

[www.KittenPurrs.escort9.com](http://www.KittenPurrs.escort9.com) Profile

Service Area: Schaumburg

Service Type: Erotic

Market Focus: Premium

Powered by vFlyer.com vFlyer Id: 2169485

- Location: SCHAUMBURG INCALLS/OUTCALLS ALL OVER
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1007165221



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## Femme Son looking for Sugar Daddy - m4m - 19 (Travel Chicago)

Reply to: [pers-987529501@craigslist.org](mailto:pers-987529501@craigslist.org) 

Date: 2009-01-10, 11:48AM CST

Just another young white college boy in the city looking for some scholarship from a generous older man. Clean and disease free, shaved. I am mostly sub but I can dom on occasion. I am, short, trim, in shape and I am great at massage. Suggested donation for a massage is 75 for in the city, no hidden fees. Travel/outcalls only for now. I like to talk or we can get right down to business. I am very discrete, welcoming to first time married guys or experienced players. Into safe play only, I know you'll love my massage so hit me up today.



- Location: Travel Chicago
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 987529501

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
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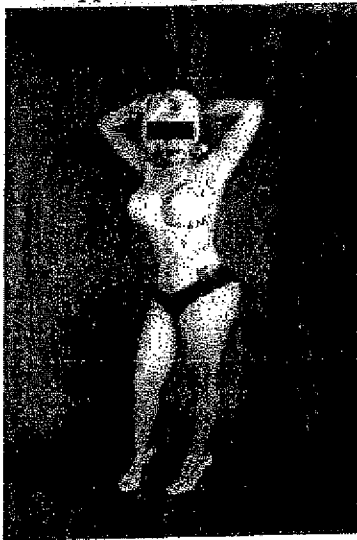
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# HOT~TRANSEXUAL~VISITING~SHORT~TIME~IN~TWON~ - t4m - 27 (O'HARE/ROSEMONT~)

Reply to: [pers-1005644116@craigslist.org](mailto:pers-1005644116@craigslist.org)   
Date: 2009-01-24, 9:33AM CST

Hi gentlemen

iam sexy cristal, a natural, beautiful and sexy latina ready to make your dreams come true, let me seduce you with my hot body, i have a very nice, slim body, i stand 5'4 135bs 36d-22-38 very sexy and hot, i love to show my affections in all the right places, i have 7" surprises and iam always ready to play, if you want to have, to spent and enjoy a really great time with a beautiful ts latina dont wait so long and give me a call 612/ / ~ you wont be disappointed. just serious callers please, no private calls or they will be ignore



- Location: O'HARE/ROSEMONT~
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1005644116

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## Handsome Puerto Rican - m4w - 24 (Chicagoland)

Reply to: [pers-1000723771@craigslist.org](mailto:pers-1000723771@craigslist.org) <sup>[3]</sup>  
Date: 2009-01-20, 3:32PM CST

Hello to all the great ladies out there. Due to the way the economy is I am willing to do almost anything to get money. I'm 5'11" and very good looking. I was born and raised in Puerto Rico. I have been in the service for 6yrs. I can hold a conversation and I'm a very fun person to be with. I will do anything. I will go out with you on a night in town; I will be your boyfriend for the night. Ill go to a wedding with you or clubbing or even strip for a bachelorette party or just for you or a group of girls. Ill dance salsa with you, have a drink with you. Ill even do your laundry and clean your house. I will sit with you and hear you talk give you my best advice. I can give very good massages, ill even rub your feet. I am not a pansy or a slave, I just need money. I have no age limit from 18-99, I have no look preferences you can be 3'5" or 7' tall be skinny or heavy I don't care I just need money. Email me with your email and a picture I will email you as many pictures as you would like. In the email state what you would like to do and a phone number I can call you please note will call you at my earliest convenience. Thank You and Please Please hire me you won't be disappointed. I have pictures upon request.



- Location: Chicagoland
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1000723771

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## HOT EROTIC MASSAGE/ESCORT FROM HOT BOI - m4m - 20 (Chicago)

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Reply to: [pers-1004104258@craigslist.org](mailto:pers-1004104258@craigslist.org) [2]

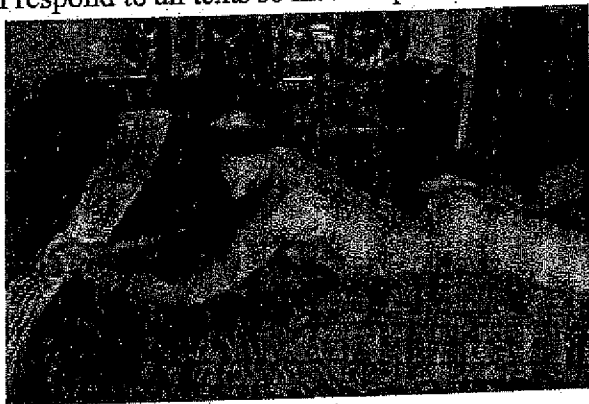
Date: 2009-01-23, 4:21AM CST

Sexy outgoing hot boi giving erotic massage /escort service from hot 6ft 150lbs and 8 " and thick all for your erotic needs

rates are 100 an hour and 350 for 4 or more hours and 1700 for the whole week

my contact info is 773            look forward to hearing from you

i respond to all texts so hit me up



- Location: Chicago
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1004104258

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<input type="checkbox"/> <a href="#">best of craigslist</a>

**>>Busty Blonde Pregant Beauty ~  
Massage~Specials~ All Day~!!!~ - w4m - 28  
(Barrington Rd & I-90)**

Reply to: [pers-1009578861@craigslist.org](mailto:pers-1009578861@craigslist.org) <sup>[2]</sup>  
Date: 2009-01-27, 9:42AM CST

Have You Ever Fantasized About A Fully Nude, Full Body Erotic Massage, Given To You By A Busty Blonde Pregant Beauty!

I Have A Delicate Touch That Will Leave Tingling Sensations Inprinted In Your Mind Long After I Am Gone. If You Have The Desire And Time For An Alluring Encounter, You Will Never Be Disappointed With The Erotic Experience That Awaits You. I Know You Want Me! You Know What You Must Do.

!!!!!!!!!!!!!!!!!!!!!!Don't Miss Out!!!!!!!!!!!!!!!!!!!!!!  
(((((((((((Special Rate Today ~\$75 Half Hour~~\$150 Full Hour))))))))))))))

Ask for Jamie 224-



- Location: Barrington Rd & I-90
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1009578861

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# T e e ns for CASH....Young Hot G!rlSS!!! open all night! \$150!!!!!!! - w4m

Reply to: [pers-1005462616@craigslist.org](mailto:pers-1005462616@craigslist.org)  
Date: 2009-01-24, 2:57AM CST

T e e ns for CASH....Young Hot G!rlSS!!! open all night! \$150!!!!!!!

\$100 quickie

youngest and hottest girls in chicagoland

(630) -

actual pic of Jennifer (19) all girls here are over 18!!!!!!



- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 1005462616

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## Hott young girls needed for new naughty nanny service - m4ww - 35 (Chicago (South Midway))

Reply to: [pers-991610815@craigslist.org](mailto:pers-991610815@craigslist.org) <sup>™</sup>

Date: 2009-01-13, 3:03PM CST

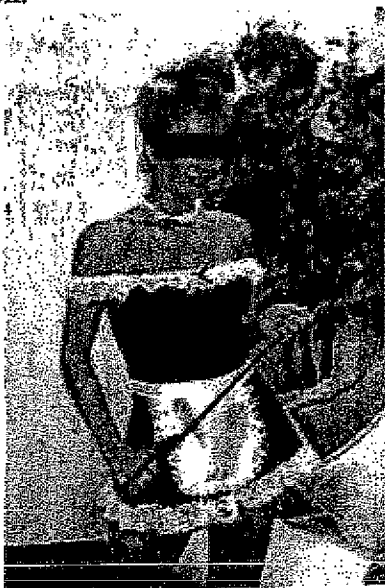
Are looking to make some good money in this tough economy. Minimum pay is \$25 per hour to look pretty and be a nanny to single fathers across the chicagoland area. Ever fantasized about being a hot young sexy nanny for an attractive man and his children, then this job is for you. Looking to hire women ages 18 to 27 for this new enterprise. Must provide 3 pics (At least one sexy photo). Must provide a resume, some knowledge and experience with children a plus. Will provide training if hired.

Looking for short-term, long-term, overnight sitters and nannies to be placed in upscale homes. All clients screened and security provided if necessary.

Applicants must be able to pass a background check and have their own reliable transportation.

If you are interested remember to send your information, name, contact info, sexy pic. Will contact with date, time and location of interviews

Amateurs only. No professional ladies need apply. This is a legitimate business venture and not a solicitation for prostitution. Anything that happens during your employment with clients is between two consenting adults. Pay is for hours in which you are performing duties specified in Naughty Nannies handbook.



- Location: Chicago (South Midway)
- it's NOT ok to contact this poster with services or other commercial interests

PostingID: 991610815

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