

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

: Civil Action No.: 2:13-CV-03952

BACKPAGE.COM, LLC, :
Plaintiff, :

v. :

JOHN JAY HOFFMAN, Acting Attorney :
General of the State of New Jersey, et al., :

Defendants, in their official :
capacities. :

: Civil Action No.: 2:13-CV-03953

THE INTERNET ARCHIVE, :
Plaintiff, :

v. :

JOHN JAY HOFFMAN, Acting Attorney :
General of the State of New Jersey, et al., :

Defendants, in their official :
capacities. :

**CERTIFICATION OF PENNY VENETIS IN SUPPORT OF
MOTION FOR LEAVE TO FILE *AMICUS CURIAE* BRIEF**

I, Penny M. Venetis, hereby certify the following:

1. I am an attorney admitted to practice law in the State of New Jersey and in the U.S. District Court for the State of New Jersey. I have been teaching Civil Rights Law and International Human Rights Law at Rutgers Law School for twenty years. I am a member of the clinical faculty and am the Judge Dickinson R. Debevoise scholar at the law school. I am the Director of the Rutgers International Human Rights Clinic and Co-Director of the Constitutional Law Clinic. I have written hundreds of briefs as either lead counsel or amicus counsel on civil

rights and human rights matters in cases pending in state and federal courts throughout the U.S., including the United States Supreme Court. I have also submitted briefs to various international tribunals, including the European Court for Human Rights and the Inter-American Commission for Human Rights. I make this certification in support of the motion of *amici curiae* for leave to file an amicus brief in the above-captioned matter. I have personal knowledge of the matters set forth below.

2. *Amici*, on whose behalf I submit a proposed brief in this case, are a group of public interest groups, citizens' groups, and service providers that devote significant resources and time to fighting human trafficking in New Jersey, nationally and internationally. The full list of *amici* is attached to this certification as Exhibit A.

3. This case raises considerable public interest and policy concerns regarding the facilitation of human trafficking through online bulletins. Here, the special interests, involvement, and expertise of *amici* are substantial.

4. Backpage.com defines itself as a website that allows users to post classified ads for goods and services. This intentionally innocuous and sanitized definition, however, does not adequately describe Backpage.com's "adult services" section. In reality, this section has been used to post advertisements for trafficked women and children for sex and labor. The participation of *amici* will assist the Court in fully understanding the global crisis of human trafficking and the role of Backpage.com in facilitating it, including in New Jersey.

5. Federal courts have held that *amicus curiae* may assist in cases of general public interest to supplement the efforts of parties and to bring to light issues that may otherwise not be adequately represented. *See United States v. Alkaabi*, 223 F. Supp. 2d 583, 592 (D.N.J. 2002) (granting motion for leave to file *amicus curiae* brief to Royal Embassy of Saudi Arabia).

6. “The extent, if any, to which an amicus curiae should be permitted to participate in a pending action is solely within the broad discretion of the district court.” *Id.* (citing *Waste Mgmt. of Pa., Inc. v. City of York*, 162 F.R.D. 34, 36 (M.D. Pa.1995); *see also Liberty Lincoln Mercury, Inc. v. Ford Mktg. Corp.*, 149 F.R.D. 65, 82 (D.N.J. 1993); *Yip v. Pagano*, 606 F. Supp. 1566, 1568 (D.N.J.1985), *aff’d*, 782 F.2d 1033 (3d Cir.1986).

7. “Although there is no rule governing the appearance of amicus curiae in the United States District Courts,” some federal courts have looked to “the Third Circuit’s application of Fed. R. App. P. 29, which governs the appearance of amici in the United States Courts of Appeals,” for guidance. *Alkaabi*, 223 F. Supp. 2d at 592. Generally, courts have granted requests for *amicus curiae* status when: (1) there is a “special interest” in the case; (2) that interest is “not represented competently or at all in the case”; (3) the information is timely and helpful; and (4) “the amicus is not partial to a particular outcome.” *Id.*

8. Groups, such as those listed in Exhibit A, with “policy interests” in a pending lawsuit have been “regularly allowed to appear as amici.” *Id.*; *see also Neonatology Assocs., P.A. v. Comm’r of Internal Revenue*, 293 F.3d 128, 131 (3d Cir. 2002). at 131-32.

9. Upon information and belief, in our proposed brief, *amici* set forth information that has not been competently or adequately represented by the parties. For example, *amici* bring to light the significant harm that the Backpage.com causes to the most defenseless and vulnerable individuals in the United States, including New Jersey. They also raise legal arguments not raised by the parties that *amici* believe will assist the Court in its consideration of this case.

10. Additionally, *amici* correct the mischaracterization of Backpage.com as a defender of civil rights and expose its real motivation—profiting from the trafficking of men, women, and children for sex and forced labor.

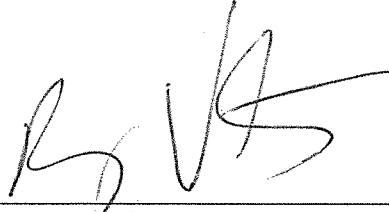
11. Reliable statistics and data from the U.S. State Department, the Federal Bureau of Investigation, and other sources are used to show that human trafficking is modern-day slavery and a global crisis affecting millions of victims, including U.S. citizens, children, and others. *Amici* also show that New Jersey is a known locale and destination for human trafficking because it is a key transportation hub with a diverse population and a close proximity to New York. Further, as the New Jersey Law Journal reported, the upcoming 2014 Super Bowl (to be held in New Jersey) will likely increase trafficking in the State. The New Jersey Law Journal reported that "the Super Bowl draws traffickers who arrange to import droves of young women, and sometimes young men, to be of sexual service to high-rolling male sports fans in town for just a few days. . . ." Editorial, *Throwing a Block at Human Trafficking*, N.J. Law J., May 17, 2013, available at

<http://www.law.com/jsp/nj/PubArticleNJ.jsp?id=1202600701407&slreturn=20130618180429>.

13. *Amici* have information essential to the Court regarding how Backpage.com, through its "adult services" advertisement section, knowingly profits from trafficking where children and adults are forced to have sex for the profit of pimps. Traffickers who sell children for sex have been prosecuted and convicted in federal court for using Backpage.com to promote their illegal activities. State legislatures across the country and the U.S. Senate have recognized Backpage.com's role in child sex trafficking.

14. Finally, *amici* explain how Backpage.com's alleged efforts and attempts at combating trafficking by "screening" advertisements by johns are anemic at best, as Backpage.com depends on its "adult services" section for much of its profit.

I hereby certify that the foregoing statements made by me are true and correct to the best of my knowledge. I understand that I may be subject to punishment if any statements herein are determined to be willfully false.



Penny M. Venetis, Esq.

International Human Rights Clinic
and Constitutional Law Clinic
Rutgers School of Law-Newark
123 Washington Street
Newark, New Jersey 07102

Attorney for *amicus curiae*

Dated: July 19, 2013
Newark, New Jersey

EXHIBIT “A”

LIST OF AMICI CURIAE

The Anti-Trafficking Taskforce - Atlantic County

ATTAC (Anti-Trafficking Taskforce of Atlantic County) was founded in 2005 and has 40 member organizations. In 2008, ATTAC received the National Association of Counties (NACo) award for “best practice.” ATTAC is committed to supporting victims and survivors of commercial sexual exploitation, forced labor, and domestic servitude, and strives to build a coordinated community response to combat the perpetrators of modern-day slavery. It also works to strengthen the anti-trafficking movement by raising awareness and empowering the community to take a proactive stance against trafficking.

Benedictine Academy

Benedictine Academy, a 99-year-old college-preparatory high school in Elizabeth, New Jersey, has been educating and raising awareness on Human Trafficking since 2006. The Benedictine Academy believes in a shared responsibility to build a more just, peace-filled world. In 2013, Benedictine Academy's staff and students were awarded the National Jefferson Ambassador Gold Medal, Washington DC, the New Jersey Governor's Jefferson Award Gold Medal for Public Service, the USA Character Award, Teacher Hero Award and Youth Hero Award by National Liberty Museum, for its anti-human trafficking education and civil advocacy program.

Calvary Temple Assembly of God

Calvary Temple Assembly of God is a local church with campuses in Wayne, Hackensack and Butler, New Jersey. Calvary Temple has a world-wide constituency of approximately 65 million. Its local congregation, founded in 1967, currently has approximately 2,700 constituents. In furtherance of its mission statement, Calvary Temple is working to combat human trafficking with immediate plans to open a residential program for victims of this heinous crime.

Camden County Women's Center

The Camden County Women's Center is a private organization dedicated to assisting survivors of domestic violence, build violence-free lives, and to reduce domestic violence through community education initiatives. The CCWC is located in Trenton, NJ where the organization offers shelter services and community outreach for victims of domestic violence.

Cape Atlantic Integrated Network for Kids

Cape Atlantic Integrated Network for Kids (INK) is a nonprofit organization providing care management services to youth ages 5 to 21, with behavioral health challenges. These youths are often prime targets for traffickers. The agency is a provider under the state wide New Jersey Children's System of Care under the Department of Children and Families, and serves both Atlantic and Cape May counties. The mission of Cape Atlantic INK is to keep kids at home, in school and out of trouble. The organization has joined forces with the community to combat human trafficking and assure safety for vulnerable youth.

Catholic Health East

Catholic Health East ("CHE") is the largest not-for-profit provider of home health care services—ranked by number of visits—in the nation, as well as the nation's leading provider of PACE (Program of All Inclusive Care for the Elderly) based on the number of programs, has worked for several years with companies on human trafficking issues through investments and work of the Interfaith Center on Corporate Responsibility (ICCR). CHE operates 35 acute care hospitals, four long-term acute care hospitals, 26 freestanding and hospital-based long-term care facilities, 12 assisted-living facilities, four continuing care retirement communities, eight behavioral health and rehabilitation facilities, 31 home health/hospice agencies and numerous

ambulatory and community-based health services. Catholic Health East facilities employ more than 60,000 full-time employees as partners in ministry. CHE is based in Newtown Square, Pennsylvania, and sponsors health ministries in 11 eastern states from Maine to Florida. In New Jersey, CHE operates in Camden, Burlington County, Trenton and Newark.

The Center of Counseling and Wellness LLC

The Center of Counseling and Wellness LLC (CCW) is located in Southern New Jersey. CCW provides intensive mental health services for trauma victims. The programming has a strong focus on human trafficking and sexual exploitation, and works with numerous organizations and law enforcement officials. The Center's CEO and Clinical Director has published, through the New Jersey Child Welfare Institute, "Human Trafficking and Child Welfare," a report that which was the first in the country to address the need of a collaborate approach to human trafficking in child welfare.

Domestic Abuse and Sexual Assault Crisis Center of Warren County

The Domestic Abuse and Sexual Assault Crisis Center's mission is to support and empower those affected by domestic violence and sexual assault and to develop a community where there is no acceptance of or tolerance for abuse or assault. The organization, founded in 1989, is located in Washington, NJ and has provided emergency shelter for more than 2,000 women and children, responded to almost 82,000 emergency hotline calls, and provided counseling for more than 20,000 adults and teens.

ECPAT-USA

ECPAT-USA is the leading ECPAT policy organization in the United States and belongs to an international network of ECPAT organizations that have offices in 73 countries around the

world. It is based in Brooklyn, New York and founded in 1991. ECPAT-USA's mission is to end the commercial sexual exploitation of children by raising awareness of the issue, advocating for the victims, developing policy for private companies, law enforcement, and government bodies to fight the problem, and passing legislation that protects the victims and penalizes the traffickers and exploiters. www.ecpatusa.org.

Franciscan Sisters of Peace

The Franciscan Sisters of Peace is a congregation of 53 Roman Catholic sisters who reside and minister in the New York/New Jersey area. The members have committed themselves to support the advancement of human rights and the elimination of the exploitation of the poor. The Franciscan Sisters of Peace stand in opposition to all forms of human trafficking. They are active members of area coalitions that work to end human trafficking, and support their efforts to advocate for just laws prohibiting trafficking, as well as efforts to provide assistance to persons who have been trafficked.

Haddasah- The Northern New Jersey Region Chapter

Haddasah, The Northern NJ Region Chapter, based in West Orange, NJ, is a subsidiary of Haddasah, The Women's Zionist Organization of America, Inc. Haddasah is a national organization based in New York and founded in 1912. Haddasah's mission embraces healthcare and advocacy for women. Along these lines, Hadassah, is working to combat human trafficking. Hadassah has over 300,000 members nationwide with approximately 11,000 of them residing in the Northern NJ Region (stretching from Upper Bergen County to Union County).

The HEAAT Foundation Inc.

The HEAAT Foundation (Helping to Educate and Advocate Against Trafficking) is a federally approved non-profit organization that is committed to the support and advocacy of victims and survivors of commercial sexual exploitation, forced labor, and domestic servitude. HEAAT is building a community coordinated response to prevent human trafficking through awareness, educating, and empowering the community to take a proactive stance against these crimes.

The International Justice Project

The International Justice Project, Inc. is a nonprofit organization located in Newark, New Jersey that promotes human rights through the rule of law and provides holistic support to victims of the world's most heinous crimes, including genocide, crimes against humanity, war crimes, and human trafficking. It works across sectors and disciplines and at the local and policy levels to help victims heal and rebuild their lives through transitional justice mechanisms. Its approach incorporates individual criminal justice and accountability, advocacy, human rights, education, and health, and it allows us to have long-lasting, sustainable effects.

Jersey Battered Women's Service

Jersey Battered Women's Service, located in Morris County, NJ, is a full-service domestic violence and domestic abuse prevention agency with volunteer opportunities. The organization offers various services including a 24-hour hotline, counseling, a safe house, transitional living education, children's services, vocational counseling, batterers' intervention, and youth prevention programs.

Jewish Federation of Greater MetroWest New Jersey - Community Relations Committee

The Community Relations Committee of Greater MetroWest NJ (CRC) is the government affairs, public policy, and advocacy arm of Jewish Federation of Greater MetroWest NJ, which encompasses Essex, Morris, Sussex, Union, and parts of Somerset County. The CRC is the facilitator of the New Jersey Coalition Against Human Trafficking, which is a coalition of advocacy groups working to fight human trafficking.

Jewish Labor Committee

The Jewish Labor Committee (“JLC”) is a national organization based in New York. It was founded in 1934 to oppose the rise of Nazism in Germany. The JLC enables the Jewish community and the trade union movement to work together on important issues of shared interest and concern, in pursuit of economic and social justice. Included in this is work to fight human trafficking. The Jewish Labor Committee has staffed offices in Boston, New York City, Philadelphia, Chicago, and Los Angeles, and volunteer-led groups in Detroit, Washington, Cleveland, and Miami.

Jewish Women's Foundation of New Jersey

The Jewish Women’s Foundation of New Jersey (JWF) educates women about the power of philanthropy by pooling funds and collaboratively and strategically awarding grants to address areas of need and importance to all women and girls. The organization is a part of the Jewish Federation of Greater Metrowest NJ, an organization that has 126,000 members.

Junior Leagues of New Jersey

The Junior League is an international organization of over 150,000 women committed to promoting volunteerism and to improving the community through effective action and leadership. Junior Leagues of NJ - State Public Affairs Committee (SPAC) is a statewide, non-partisan committee made up of representatives from each of the eight Junior Leagues in New Jersey who join together to take action on select state and national public issues. It has a membership of 3,000 women. SPAC advocates for initiatives and legislation to improve the quality of life for women and children, improve the quality of education, and improve the environment. Since 2009, SPAC has held multiple conferences dedicated to human trafficking issues in New Jersey, as it is a portal state for traffickers. SPAC is focused on prevention, protection, prosecution (of johns) and partnership to fight trafficking. SPAC lobbied to pass the Human Trafficking Prevention, Protection and Treatment Act in NJ.

LifeWay Network

LifeWay Network was incorporated in 2007 as a New York State 501(c)3 Corporation. Its mission is to provide Safe House for women survivors and education to the general public. LifeWay House opened in March 2012 with facilities to house five women survivors. The organization addresses the need for a safe space in which victims and survivors can heal.

Kean University

Kean University, founded in 1855, is the third largest public university in New Jersey. It has a satellite campus in Wenzhou, China. Through its Human Rights Institute, Kean educates students and the greater community about the social issue of human trafficking. It ran an international conference in 2009 entitled, "Slavery in the 21st Century" which attracted close to 1000 participants. The Human Rights Institute Gallery in the spring of 2012 hosted an exhibition of the photography of Kay Chernush entitled, "Borderless Captivity: Exploitation and Human

Trafficking.” The students in Kean’s Masters programs in Social Justice, Criminal Justice and Social Work have done internships with organizations such as the Polaris Project, providing services to the victims of human trafficking. Kean University hosted three conferences dedicated to developing legislation to combat human trafficking. Kean University is committed to training its students to be advocates for social justice, which includes combatting human trafficking.

Lutheran Office of Governmental Ministry

The Lutheran Office of Governmental Ministry (LOGM) is a state organization based in Hamilton Square, NJ. It was founded in 1987 as an advocacy branch of the New Jersey Synod of the Evangelical Lutheran Church in America. LOGM works to address justice and peace issues in part by joining with other organizations to combat human trafficking. LOGM has 186 member congregations in New Jersey and works with more than 15,000 Lutherans statewide.

The Morris County Human Relations Commission

The Morris County Human Relations Commission was founded in 1992 with the goal to encourage, develop, promote and strengthen respect for human rights and cultural diversity among the people of Morris County. Consistent with that mission, the Morris County Human Relations Commission, along with the Morris County Prosecutor’s office, initiated the first meeting to discuss the issues of human trafficking in Morris County and throughout the state. The Commission, along with the West Morris Section of NCJW, is an original member of the New Jersey Coalition against Human Trafficking and continues to be actively informed and involved in human trafficking.

National Council of Jewish Women – New Jersey Chapters

The National Council of Jewish Women is a grassroots organization of volunteers and advocates who turn progressive ideals into action. Inspired by Jewish values, NCJW strives for social justice by improving the life for women, children and families, including victims of human trafficking, by safeguarding individual rights and freedoms. NCJW has 82 sections with approximately 90,000 members and supporters across the country.

National Council of Jewish Women Bergen County Section

The National Council of Jewish Women Bergen County Section was founded in 1923, is based in Bergen County, New Jersey and enjoy a membership of over 1,000. It is part of the New Jersey Coalition Against Human Trafficking and will host a community-wide program devoted to Human Trafficking/Modern Day Slavery in Teaneck, NJ on November 19, 2013.

National Council of Jewish Women Essex County Section

National Council of Jewish Women, Essex County Section, was founded in 1912, is based in Livingston, NJ and has over 3,000 members. Its mission is to support women, children and families and has taken a strong interest in combating human trafficking. NCJW/Essex has organized several programs on human trafficking for its more than 3,000 members.

National Council of Jewish Women Union County Section

Founded in 1917, this chapter implements the mission of the national NCJW organization. The Union county chapter is located in Westfield, NJ.

National Council of Jewish Women West Morris Section

National Council of Jewish Women West Morris Section was founded in 1988, is based in Morris County, New Jersey and has 165 members. NCJW West Morris Section is a founding member of the New Jersey Coalition Against Human Trafficking. It supported community conferences and contacted every mayor in Morris County to urge them to issue proclamations declaring January 11, 2013 Human Trafficking Awareness Day in New Jersey.

National Council of Jewish Women (NCJW) - New Jersey State Policy Advocacy Network

National Council of Jewish Women (NCJW), New Jersey State Policy Advocacy Network is a statewide organization based in Elizabeth, New Jersey with 5,500 members from ten NCJW Sections throughout New Jersey. With a strong commitment to social justice, peace, and human rights, works to combat human trafficking and is proud to be a party to the Amicus Brief in the BackPage.com v. Hoffman lawsuit.

The National Organization for Women – New Jersey Chapters

The National Organization for Women has actively addressed the issue of Human Trafficking since at least the 1990's and has encouraged its chapters across the United States to organize activities around this issue. In New Jersey, NOW NJ was incorporated in 1975 and has thirteen chapters throughout the State of New Jersey. Its mission is to take action to bring women into full participation in the mainstream of American society in equal partnership with men. One of NOW's six priority issues is combating violence against women. Under this umbrella issue NOW NJ is committed to fight against all forms of human trafficking.

NOW - The Morris County Chapter

The Morris County Chapter of the National Organization for Woman (MCNOW) was founded in 1973. Its priority issues include reproductive justice, economic justice, promoting diversity, ending racism, and stopping violence against women, which includes fighting against all forms of human trafficking.

NOW - Northern New Jersey Chapter

Northern New Jersey NOW (NNJ NOW) was formed in 1971, has members from Bergen and Hudson Counties, and represents about 225 members.

NOW - South Jersey / Alice Paul chapter

South Jersey NOW–Alice Paul chapter was founded in 1971 and has 300 members, in ages ranging from 20-95. It includes women and men who work to further legal, social, and political equality for women and their families. It has a mission of advocacy in many areas, including the Equal Rights Amendment, reproductive rights, empowering young feminists, economic equity, violence against women and combating racism

The New Jersey Coalition for Battered Women

The New Jersey Coalition for Battered Women (NJCBW) is a statewide organization based in Trenton, New Jersey. It was founded in 1978. Its mission is to end domestic violence. NJCBW consists of 24 member organizations that provide protective and counseling services to victims of domestic violence. NJCBW provides training and technical assistance for member program staff and professionals in the community. NJCBW and its member programs are working to combat human trafficking through collaboration with human trafficking coalitions and providing supportive services to victims of trafficking referred to their programs.

The New Jersey State Association of Jewish Federations

NJ State Association of Jewish Federations is the advocate for NJ's 11 Jewish Federations and their beneficiary and affiliated agencies on public and government affairs. The Association is the outreach arm for the state's federations to the NJ Legislature, Governor's Office, Departments of State Government, NJ's members of Congress, Jewish and non-Jewish interests organizations and national Jewish public interest organizations in Washington, D.C. The NJ State Association of Jewish Federations is a member of the New Jersey Coalition Against Human Trafficking.

NJ Coalition Against Sexual Assault

The mission of the New Jersey Coalition Against Sexual Assault (NJCASA) is to promote the compassionate and just treatment of survivors and their loved ones; foster collaborative relationships between community systems; and affect attitudinal and behavioral changes in society to eliminate sexual violence against all people. In 2010 the organization provided counseling to 4,375 survivors and their loved ones, answered 16,880 hotline calls and emails, and accompanied 1,972 survivors to medical/ forensic exams, police investigations or court appearances.

Passaic County Women's Center

Located in Peterson, New Jersey, the Women's Center provides emergency shelter, counseling, and community outreach to victims of domestic violence.

Prevent Child Abuse New Jersey

Prevent Child Abuse NJ is a state organization based in New Brunswick. It was founded in 1979 as the NJ chapter of Prevent Child Abuse America. Today, it is one of the largest chapters in the nation recognized for its prevention work in all 21 counties throughout the State. Its mission is to prevent child abuse in all of its forms. Prevent Child Abuse NJ is working with the NJ Coalition Against Human Trafficking and with the NJ Attorney General's Human Trafficking Task Force to develop awareness of the issue and prevent children from becoming victims of trafficking.

Rachel Coalition

Rachel Coalition, a division of Jewish Family Service of MetroWest, began in 1997 as a grassroots organization of Jewish Family Service, United Jewish Communities of MetroWest and the National Council of Jewish Women, Essex County Section. Today, Rachel Coalition uniquely combines the resources and commitment of affiliated groups, social services and its nine partners of northern New Jersey organizations to assist domestic violence and trafficking victims and their families with a wide array of services. Since its inception, the Coalition has served hundreds of men, women and children. Rachel Coalition's mission is to improve the lives of those affected by domestic violence and trafficking by providing a comprehensive and coordinated response in the MetroWest Jewish community and in the community at large. Rachel Coalition is a founding member of the New Jersey Coalition Against Human Trafficking.

Salem County Women's Services

Located in Salem, New Jersey, Salem County Women's Services provides free, confidential support for adults and children who are in need of personal safety. The organizations services include access to emergency shelters, a 24-hour confidential hotline, crisis counseling, support

groups, counseling for individuals, groups and families, court preparation, court accompaniments and legal advocacy.

The Salvation Army - New Jersey Division

The Salvation Army is an evangelical part of the universal Christian church established in 1865. Nearly 30 million Americans receive assistance from The Salvation Army each year through the broadest array of social services that range from providing food for the hungry, relief for disaster victims, assistance for the disabled, outreach to the elderly and ill, clothing and shelter to the homeless and opportunities for underprivileged children. Along these lines, The Salvation Army works to combat human trafficking. The Salvation Army USA's anti-trafficking efforts focus on four core areas: legislature and policy initiatives, awareness raising and training, prevention efforts, as well as the development and provision of trafficking survivor services.

Sisters of Charity of Saint Elizabeth

The Sisters of Charity of Saint Elizabeth is a Catholic religious order based in Convent Station, NJ. It was founded in 1959. With over 340 sisters and with more than 250 Seton Associates, action on behalf of social justice and human dignity is pursued both nationally and internationally. The Sisters of Charity of Saint Elizabeth works to combat human trafficking.

School Sisters of Notre Dame AM Province, Office of Justice and Peace

The organization is a regional organization with members in NY, NJ, CT, PA, DC, MD, FLA, and IL. It was founded in 1847. Its mission is to help poor women and children. Along these lines, School Sisters of Notre Dame AM province, is working to combat human trafficking. School Sisters of Notre Dame has 600 members in this region of the United

States. The organization sponsors many schools, a university and many social and educational outreach programs.

The Tri-State Coalition for Responsible Investment

The TRI-State Coalition for Responsible Investment (CRI), founded in 1975, is an alliance of Roman Catholic institutional investors primarily located throughout New Jersey and the New York metropolitan area. CRI's members use their power as shareholders to hold corporations accountable to social and environmental concerns. In making decisions about managing resources and investments, Coalition members view local and global economies not only in terms of production and distribution, but also by their effects on the environment and the dignity of the human person. Along with the Interfaith Center on Corporate Responsibility (ICCR), the Coalition has worked for several years with companies in a broad range of industries to establish comprehensive human rights policies that incorporate anti-trafficking and anti-slavery measures. CRI's members help educate companies about the realities of trafficking and the business risks associated with these human rights violations.

Womanspace, Inc.

Womanspace, Inc. is the local domestic and sexual violence victims service provider based in Mercer County, New Jersey. The agency was founded in 1977, and has served over 301,076 adults and children. Its mission is to prevent abuse, protect families, and change lives through empowerment and a safety net of supportive services. Womanspace contributes to the abolition of sex and labor trafficking in persons in Mercer County and within New Jersey by providing prevention, intervention, and survivor restoration services that include hotlines and protective shelter. Womanspace is a member of the New Jersey Coalition of Battered Women, the New Jersey Coalition Against Sexual Assault, and the New Jersey Human Trafficking Coalition. Womanspace also collaborates with community agencies that provide housing, mental health and

addiction services, as well as legal assistance in cases involving: immigration, child custody, and domestic violence.

YWCA – New Jersey Chapters

The YWCA’s mission is to eliminate racism, empower women, and promote peace, justice, freedom, and dignity for all. The YWCA USA has over 25 million members in 122 countries, including 2.6 million members and participants in 300 local associations in the United States. The YWCA recognizes sex trafficking as a worldwide epidemic, one that harms women and girls especially, and prevents all of us from achieving a world free from violence. YWCAs throughout New Jersey work to combat human trafficking.

In its support of this Amicus Brief, the YWCA of New Jersey has garnered the support of all 6 YWCA’s of New Jersey, which collectively serve well over 10,000 individuals annually in programs that empower women.

YWCA - Bergen County Chapter

YWCA Bergen County was founded in 1920, is based in Hackensack, and has 4,000 members countywide. A key program of the YWCA Bergen County is healingSPACE, which provides a wide range of services to survivors of sexual violence and their loved ones, as well as information and education to the community. HealingSPACE and YWCA Bergen County recognize sex trafficking as a worldwide epidemic, one that harms women and girls especially, and prevents all of us from achieving a world free from violence.

YWCA - Central NJ Chapter

The YWCA supports anti-violence policies that protect victims, hold perpetrators accountable, and work to eradicate sexual assault and domestic violence, trafficking of

women, and dating violence. Specifically, it supports the continuance of legislation and programs that ensures employment stability and economic security for female victims of violence.

YWCA - Eastern Union County Chapter

YWCA Eastern Union County was founded in 1920 and is the designated domestic violence service agency in Union County, New Jersey. YWCA Eastern Union County served over 5,000 individuals through direct and indirect domestic violence related services in 2012. YWCA Eastern Union County serves victims of human trafficking in many of its programs.

YWCA - Princeton Chapter

For ninety years, the YWCA Princeton has served Mercer County and central New Jersey through educational and recreational classes, social services, advocacy, and leadership development. It is a not-for-profit organization with thousands of women, men, children and families as members.

YWCA - Trenton Chapter

The YWCA Trenton is dedicated to eliminating racism, empowering women and promoting peace, justice, freedom, and dignity for all. There are various education and outreach programs at the chapter to help the community achieve these goals.

EXHIBIT “B”

centraljersey - escorts - 1 x

posting.centraljersey backpage.com/online/classifieds/PostAdPpl.html/cnj/posting.centraljersey.backpage.com/

Pin It Symplify tools

Choose File No file chosen

Recommended Upgrades (minimum purchase is \$0.99)

Auto Repeat Ad

Automatically re-post your ad to the top of the listings every: after

Number of times:

8 times for \$340.00
12 times for \$144.00
26 times for \$288.00

Sponsor Ad

For \$13.65 per week, your post will appear highlighted with thumbnails on the right side of the escorts category. [More info](#)

- Number of weeks:
- or select a discounted package:
- 4 weeks for \$40.95 (25%)
 - 12 weeks for \$109.75 (33%)

Promotional Code

If you've received a promotional code from us, please enter it to receive your discount.

By placing this ad I agree to the [terms of use](#) and [privacy policy](#).

[Account Login](#) | [Affiliate Program](#) | [Promote Us](#) | [Contact Us](#) | [Help](#) | [Privacy Policy](#) | [Terms of Use](#) | [User Safety](#) | [backpage.com](#) © Copyright 2013

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EXHIBIT "C"

central

post

Symlicity

No file chose

9 weeks (\$122.85)

10 weeks (\$136.50)

11 weeks (\$150.15)

12 weeks (\$163.80)

13 weeks (\$177.45)

14 weeks (\$191.10)

15 weeks (\$204.75)

16 weeks (\$218.40)

17 weeks (\$232.05)

18 weeks (\$245.70)

19 weeks (\$259.35)

20 weeks (\$273.00)

21 weeks (\$286.65)

22 weeks (\$300.30)

23 weeks (\$313.95)

24 weeks (\$327.60)

25 weeks (\$341.25)

26 weeks (\$354.90)

27 weeks (\$368.55)

28 weeks (\$382.20)

29 weeks (\$395.85)

30 weeks (\$409.50)

31 weeks (\$423.15)

32 weeks (\$436.80)

33 weeks (\$450.45)

34 weeks (\$464.10)

35 weeks (\$477.75)

36 weeks (\$491.40)

37 weeks (\$505.05)

38 weeks (\$518.70)

39 weeks (\$532.35)

40 weeks (\$546.00)

41 weeks (\$559.65)

42 weeks (\$573.30)

43 weeks (\$586.95)

44 weeks (\$600.60)

45 weeks (\$614.25)

46 weeks (\$627.90)

47 weeks (\$641.55)

48 weeks (\$655.20)

49 weeks (\$668.85)

50 weeks (\$682.50)

51 weeks (\$696.15)

52 weeks (\$709.80)

Recommended U

Auto Repost Ad

Automatically re-post

Number of times:

Sponsor Ad

For \$13.65 per week

Number of weeks

or select a discount

4 weeks for

12 weeks for

Promotional Code

If you've received a price

Continue By placing

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highlighted with thumbnails on the right side of the escorts category. [More info](#)

purchase is \$0.99)

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EXHIBIT “D”

EXHIBIT “E”

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Recommended U

Auto Repost Ad

Automatically re-post
Number of times:

Sponsor Ad

For \$0.15 per week
Number of weeks

- or select a discount
- 4 weeks for
- 12 weeks for
- 26 weeks for

Promotional Code

If you've received a promotional code, please enter it to receive your discount.

By placing

- 11 weeks (\$1.65)
- 12 weeks (\$1.80)
- 13 weeks (\$1.95)
- 14 weeks (\$2.10)
- 15 weeks (\$2.25)
- 16 weeks (\$2.40)
- 17 weeks (\$2.55)
- 18 weeks (\$2.70)
- 19 weeks (\$2.85)
- 20 weeks (\$3.00)
- 21 weeks (\$3.15)
- 22 weeks (\$3.30)
- 23 weeks (\$3.45)
- 24 weeks (\$3.60)
- 25 weeks (\$3.75)
- 26 weeks (\$3.90)
- 27 weeks (\$4.05)
- 28 weeks (\$4.20)
- 29 weeks (\$4.35)
- 30 weeks (\$4.50)
- 31 weeks (\$4.65)
- 32 weeks (\$4.80)
- 33 weeks (\$4.95)
- 34 weeks (\$5.10)
- 35 weeks (\$5.25)
- 36 weeks (\$5.40)
- 37 weeks (\$5.55)
- 38 weeks (\$5.70)
- 39 weeks (\$5.85)
- 40 weeks (\$6.00)
- 41 weeks (\$6.15)
- 42 weeks (\$6.30)
- 43 weeks (\$6.45)
- 44 weeks (\$6.60)
- 45 weeks (\$6.75)
- 46 weeks (\$6.90)
- 47 weeks (\$7.05)
- 48 weeks (\$7.20)
- 49 weeks (\$7.35)
- 50 weeks (\$7.50)
- 51 weeks (\$7.65)
- 52 weeks (\$7.80)

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purchase is \$0.99)

the listings every: after

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please enter it to receive your discount.

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Disclaimer

This section contains sexual content, including pictorial nudity and adult language. It is to be accessed only by persons who are 18 years of age or older (and is not considered to be a minor in his/her state of residence) and who live in a community or local jurisdiction where nude pictures and explicit adult materials are not prohibited by law. By accessing this website, you are representing to us that you meet the above qualifications. A false representation may be a criminal offense.

I confirm and represent that I am 18 years of age or older (and am not considered to be a minor in my state of residence) and that I am not located in a community or local jurisdiction where nude pictures or explicit adult materials are prohibited by any law. I agree to report any illegal services or activities which violate the Terms of Use. I also agree to report suspected exploitation of minors and/or human trafficking to the appropriate authorities.

I have read the disclaimer and agree to all rules and regulations including the [Terms of Use](#).

I agree

I don't agree

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EXHIBIT “G”

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Disclaimer

This section contains sexual content, including pictures or explicit adult materials are prohibited and/or human trafficking to the appropriate authorities. A person who is under 18 years of age is prohibited from using this service. If you are a minor, you should not use this service. If you are a minor, you should not use this service. If you are a minor, you should not use this service.

I confirm and represent that I am 18 years of age or older, I am of legal age in my state of residence and I am not a minor in any state or country. I have read the disclaimer and agree to all rules and terms of service.

I agree
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Stop Trafficking

Please report the suspected sexual exploitation of minors and/or human trafficking to the appropriate authorities.

United States: National Center for Missing & Exploited Children (NCMEC)

- CyberTipline - report child exploitation
- 24-Hour Hotline: 1-800-543-5878

United States: National Human Trafficking Resource Center (NHTC Project)

- report human trafficking
- 24-Hour Hotline: 1-888-3737-8888

Canada: National Child Exploitation Coordination Centre (NCECC)

- Hotline: 1-800-387-7992

Global Hotlines List - Country-by-Country List of Human Trafficking Hotlines

to be a minor in
 you are representing
 action where nude
 violation of minors

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EXHIBIT “H”

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Posting Rules

You agree to the following when posting in this category:

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

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

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

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Step 1: Write Ad required fields are highlighted

Step 1: Write Ad Step 2: Preview Ad Step 3: Our email will notify you Step 4: Add Photo

If you are exploited or need help, call 211.

Notice: Ads can be a maximum length of 500 characters.
Postings in this category are \$10.00

Title: (Use capitals sparingly.)

Your Age:

Description

Location:

Your email address

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Login to your account