

CAUSE NO. \_\_\_\_\_



SEATTLE  
POLICE  
DEPARTMENT

**CERTIFICATION FOR DETERMINATION  
OF PROBABLE CAUSE**

GENERAL OFFENSE # 2008-407478
UNIT FILE NUMBER

That Todd Novisedlak is a Detective with the Seattle Police Department and has reviewed the investigation conducted in Seattle Police Department Case Number 2008-407478

There is probable cause to believe that Shawn Sylvester Clark committed the crime(s) of Promoting Prostitution 1<sup>st</sup> degree, and Promoting Prostitution 2<sup>nd</sup> within the City of Seattle, County of King, State of Washington.

This belief is predicated on the following facts and circumstances:

**YOUR AFFIANT**

My name is Todd Novisedlak and I am currently employed by the Seattle Police Department as a Detective. I have been employed as an Officer/Detective for over 15 years. During my employment with the Seattle Police Department I have worked as an officer in Patrol for approximately 13 years. In April 2007 I was assigned as a Detective to investigate property crimes and juvenile cases. In March of 2008 I was assigned to the department's Vice Unit. My training has included the attendance and successful completion of Seattle Police Detective School, Seattle Police/Washington State Undercover School, and Seattle Police Anti-Crime Team training. My principal duties as a member of the Vice Unit include the investigation of Prostitution and Promoting Prostitution related cases.



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**BACKGROUND**

On November 7, 2008, your Affiant and other members of the Seattle Police Vice unit contacted a 19 year old white female named T.G. after arranging a fictitious "date" with her at the Seatac (Seattle, Washington) Hilton. T.G. had posted an 'exotic' advertisement on Craigslist and detectives were attempting to establish whether she was prostituting herself. Detectives were also hoping to discover more information about two pimps, previously known to detectives, named DeShawn Clark and Thomas Foster. Deshawn Cashmoney Clark and Thomas Foster were the subjects of a separate investigation into promoting prostitution and possible kidnapping. Based on discussions with a woman named L.J., the victim in what was, at the time, a separate investigation, your Affiant had reason to believe that Deshawn Cashmoney Clark had been forcing T.G. into prostitution.

I contacted T.G. along with Seattle Vice Detective Bill Guyer at time and place previously arranged with T.G. over e-mail. T.G. had agreed to perform sexual acts in exchange for money. When T.G. opened her hotel room door and confirmed who she was, I told her she was under arrest for prostitution.

Post Miranda, she gave a detailed statement outlining how she had been forced into prostitution in December 2007 and then later from June 2008 through November 2008. During this conversation, T.G. claimed that she had worked for a pimp named "Goldie," but was unable to provide his true name or where he could be located. She described how "Goldie" had beaten her; had rented hotel rooms for her; and had required her to give him all of her earnings from her prostitution activities.

Six days after my initial contact with her, T.G. called me to say that she had been afraid to tell me the name of her real pimp. She feared that she would lose her life if she cooperated



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with the police and gave information about the man who was forcing her to sell her body for money. She said she desperately wanted out of the prostitution 'lifestyle' and wanted to get away from the individual who had forced her to prostitute. T.G. said that she was willing to assist law enforcement with the case because, one way or the other, she believed she would be hunted down by her pimp.

T.G. explained to me that all of the things that she had described about being forced into prostitution had happened to her; however, the name of the man who had pimped her out was DeShawn Clark, not "Goldie." T.G. was specific in explaining that Deshawn Clark, also known as "Cash" or "Cash Money", has registered her in various hotels and driven her to areas for her to work as a prostitute. She also explained how DeShawn Clark would take all of the money she had earned prostituting and that he would use force and threats of force against her regularly.

T.G. also told me that DeShawn Clark and his brother Shawn Sylvester Clark are members of a street gang called "Westside Street Mobb." T.G. believes that Shawn Clark has tattoos affiliating himself with "Westside Street Mobb," specifically a tattoo that says "Crime Fam." She also has heard Shawn Clark refer to himself as being a member of "West Side Street Mobb."

T.G. identified a then-19 year old white female named A.R. (dob 1-13-1989) as being one of Shawn Clark's prostitute. T.G. has seen A.R.'s internet postings (soliciting exotic services) and she has stayed at motels with A.R. when both women were prostituting for their pimps (Shawn Clark and DeShawn Cashmoney Clark, respectively). T.G. witnessed A.R. giving Shawn Clark money for her work as a prostitute. T.G. said she has no doubt that A.R. was working as a prostitute for Shawn Clark.



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T.G. also told me that Shawn Clark has another female, 18 year old J.Z. (6-6-1990) working as a prostitute for him. T.G. identified J.Z. by picture. T.G. believes that J.Z. began to work for Shawn Clark in August 2008. On at least one occasion, T.G. worked at a prostitute with J.Z. out of the Seatac Hilton. The two shared a room for the purpose of performing acts of prostitution.

In the fall of 2008, DeShawn Clark brought T.G. to Portland Oregon to work there as a prostitute for him. DeShawn Clark drove his green Lexus, Washington license 238SOX. They were joined by Deshawn's brother, Shawn Sylvester Clark, another West Side Street Mobb member, Gerald Jackson, and his prostitute S.A., and J.Z. DeShawn Clark booked rooms at the Doubletree Hotel at the Lloyd Center in Portland. Steve Schaffer, manager at the Doubletree Portland, confirmed that Deshawn Clark did in fact register at the hotel from September 7 through 13, 2008. While in Portland, T.G., J.Z. and S.A.. shared a hotel room. They would perform sexual acts for money on men and then give the money they earned to their respective pimps.

There is no doubt in T.G.'s mind that Shawn Sylvester Clark is J.Z. and A.R.'s pimp.

**WEST SIDE STREET MOBB**

Over the course of this investigation, this affiant has had occasion to consult with several law enforcement agents, including King County Sheriff's Office gang unit detective Joe Gagliardi. Detective Gagliardi is currently assigned to the KCSO Gang Unit, which has been tasked with gang investigative duties throughout King County. Between his previous agency in California and his current assignment, he has been actively working criminal street gangs for the last seven years of his career. Detective Gagliardi has received over 250 hours and given over 150 hours of formal training on gang awareness and investigations. Detective Gagliardi has



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contacted over 750 gang members of various Hispanic, black, Asian, white, prison, and outlaw motorcycle gangs throughout his career, and they have shared with him detailed information about gangs and their involvement.

Detective Gagliardi provided the following background information regarding the Westside Street Mobb. The Westside Street Mobb set of the Blood criminal street gang originated in West Seattle in mid-2006, roughly centered around the Delridge Community Center. Originally, Westside Street Mobb claimed the color red, but claimed to be Folk gang members. However, in late 2006, Westside Street Mobb became involved in a turf war with Down Wit the Crew BGD, over their attempted expansion into Westside Street Mobb's territory. Due to this, Westside Street Mobb dropped the Folk identifiers and only claimed Blood affiliation. Westside Street Mobb gang members associate with the color red, the word "Westside", and the name "Street Mobb". Additionally, a number of Westside Street Mobb gang members have a similar tattoo, which is a depiction of a male figure holding money in one hand and a dollar sign pendant in the other, while wearing a baseball cap and smoking a marijuana joint. This male figure will almost always have a cross tattoo on his left bicep and a scar on his left cheek. There are a number of individual variations that may appear in this tattoo, such as what is depicted on the baseball cap and writing above or below the male figure.

Some members of the Westside Street Mobb may also have a "Crime Fam" tattoo; "Crime Fam" is a clique within the Westside Street Mobb; it is believed that it consists of members that are related by blood. There are two known variations of the "Crime Fam" tattoo -- one consists solely of the words "Crime Fam", and the other has the words "Crime Fam" and an image of a male gangster wearing a backwards baseball cap, holding a smoking automatic rifle.



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There are an estimated 20-30 members of the Westside Street Mobb gang, and the gang's primary criminal activities are robbery, narcotics sales, organized prostitution, illegal weapons possession, and aggravated assaults. The gang's forced prostitution activity includes individual gang members, either working alone or with other gang members, "pimping" out juveniles and women through the use of force, fear and coercion. These prostitution activities benefit not only the individual gang member financially, but it also helps to increase the gang's influence, wealth and status.

In accordance with both Washington State RCW 9.94A.030(16) and more restrictive criteria employed by the King County Sheriff's Office, Det. Gagliardi has validated T.G.'s pimp, DeShawn Cashmoney Clark, as a known member of the Westside Street Mobb set of the Blood criminal street gang. Furthermore, it is Detective Gagliardi's opinion that Clark's involvement in organized prostitution was committed for the benefit of, and in association with, the Westside Street Mobb criminal street gang.

Throughout her discussions with law enforcement, T.G. identified the other following individuals as being close associates of Deshawn Cashmoney Clark and as members of West Side Street Mobb: Shawn Clark (Deshawn Cashmoney Clark's brother); Thomas Foster; Gerald Jackson; and Mycah Johnson.

During her months being forced into prostitution by DeShawn Cashmoney Clark (June through November 2008), T.G. saw Clark and his West Side Street Mobb associates "pimp" out a number of juveniles and young adult females. She has seen some of these women beaten by West Side Street Mobb members. She has seen a number of the women posting exotic ads on Craigslist and other prostitution-related internet sites. She has seen the women give the money



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they earn from prostitution to their pimps, which include the men listed above. She has shared rooms with them.

At Clark's direction, T.G. has traveled out of state for the purpose of prostitution with at least three of the women. In all, T.G. has identified 13 juveniles or young women, by name and picture, as being prostitutes for West Side Street Mobb members or their associates.

Through certified driver's license photos, court records, arrest reports, web postings, statements from some of the women, and discussions with other law enforcement officers, your affiant has confirmed the names and identities of 12 these victims. Your affiant has also confirmed through these same sources that all of these women have been engaged in prostitution. T.G. has also identified one other juveniles or young women by physical description and street name. As of this writing, your affiant has not been able to identify her true names or whereabouts.

**SHAWN SLYVESTER CLARK**

In September 2008, the King County Sheriff's Office Narcotics and Organized Crimes Unit (NOCU) had begun a separate investigation into Shawn Sylvester Clark and Gerald Nathaniel Jackson for promoting prostitution. Detective Todd Smith was the case detective. He and I have discussed our respective cases and have shared information about them with each other.

After a three month investigation, Det. Smith discovered three prostitutes who worked for Clark and Jackson, identified as J.Z., A.R., and S.A.. The investigation revealed that during the summer and fall of 2008, all five of these individuals lived in the basement apartment at 10439 Des Moines Memorial Drive South, in King County, WA. This fact was confirmed by surveillance, reports from law enforcement and department of licensing databases, A.R.'s



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statement, and the lease agreement for the residence. Det. Smith determined that A.R., J.Z. and S.A. were committing acts of prostitution at that location and giving all of their prostitution earnings to Clark and Jackson. A.R. and J.Z. worked for Clark; S.A. worked for Jackson.

As Smith investigated, he also discovered that Shawn Clark and Gerald Jackson are members of West Side Street Mobb, a set of the Blood criminal street gang. In accordance with both Washington State RCW 9.94A.030(16) and the more restrictive criteria of the King County Sheriff's Office, Det. Joe Gagliardi has validated Shawn Sylvester Clark as a known member of the Westside Street Mobb set of the Blood criminal street gang. Furthermore, it is Det. Gagliardi's opinion that Shawn Clark's involvement in prostitution was committed for the benefit of, and in association with, the Westside Street Mobb criminal street gang.

**Shawn Clark and J.Z.**

Det. Smith first became aware of Shawn Clark on 09-15-08. On that day, in an effort to target juvenile prostitution, Smith searched the website craigslist.org for prostitution ads, focusing on ads with photos depicting girls that appeared to be juveniles. He came across an ad for a girl identifying herself as Mary Jane. She appeared to be very young and possibly under 18. The ad was titled "Cum Have Some Fantastic Lunch With Me" and gave a phone number to contact Mary Jane. Detective Schwab, acting in an undercover capacity, called the number and spoke to a female identifying herself as Mary Jane, later positively identified as J.Z.. She told Schwab that her rate is \$300 per hour and asked him to bring some condoms. She directed him to come to the Ramada Inn in Tukwila, room 114. When Schwab made contact at the room, J.Z. answered the door topless and wearing G-string panties. She was arrested for prostitution.

Prior to making contact at the room, Detectives Hayden and Smith contacted the front desk clerk to check the room registration. They discovered that room 114 was rented by Shawn





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Sylvester Clark, DOB 02-03-88. According to the clerk, Clark rented the room for a total of eight days and paid cash. He provided his WA ID card at check-in. His ID was photocopied by the clerk.

Post-Miranda, J.Z. openly stated she had been soliciting for prostitution using the internet. She stated she had been doing this for about a month. As she talked further, J.Z. began to weep, and admitted that Clark was her pimp and had recruited her about a month prior at a party. J.Z. did not keep any of the money for herself, but had to give all her money to Clark. Clark kept tabs on J.Z. via two cellular phones.

Although J.Z. was cooperative and open about her prostitution experience, she did not wish to get Clark in trouble and did not wish to see him arrested. J.Z. considered Clark her boyfriend, but admitted that he had other girls working as prostitutes for him. J.Z. identified A.R. by name as a mutual friend who had worked for Clark. J.Z. declined to give a written statement. She was cited for prostitution and released.

On 09-22-08, Det. Smith discovered that J.Z. was once again advertising exotic services on craigslist. Her ad contained the same phone number and photo from her previous ads, with her faced now blacked-out. Detective Young called J.Z. at the same phone number and arranged a date. J.Z. stated that her services were \$300 per hour and included "everything except bareback and anal." These are slang terms that refer to sexual intercourse without a condom and anal intercourse. J.Z. asked Young to bring condoms and directed him to her in-call service location. Young followed her directions and arrived at 10439 Des Moines Mem. Dr S. He confirmed the address. Young did not go inside because of officer safety concerns and cancelled the date.

On 10-01-08, Smith searched craigslist ads and located another ad for J.Z.. She was advertising on a near daily basis, using the same photo of herself and the same phone number.



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Detective Nelson called J.Z. in an undercover capacity and arranged a date. She offered her services at \$300 per hour. Nelson asked if "anal is OK." She replied that she "does not do anal," a clear reference to anal intercourse. J.Z. directed Nelson to her in-call service location, 10439 Des Moines Mem. Dr. S. Nelson confirmed the address. Shawn Clark's Chevy Caprice, WA license 267-PDV, was parked in the driveway. Clark is the driver of this Caprice, confirmed by surveillance and police reports. Nelson did not go inside because of officer safety concerns and cancelled the date.

**Shawn Clark and A.R.**

Smith searched the KCSO database and found a cellular number for A.R. He searched the number on craigslist and found escort ads for a female named Aubrey, later positively identified as A.R. On 10-10-08, Smith called A.R. in an undercover capacity and arranged a date. A.R. quoted her prices at \$300 per hour, to include "BBBJ," a slang acronym for bareback blowjob, the performance of oral sex on a male client without a condom. The date was set for the Tukwila Travel Lodge in Tukwila. Upon arrival at her room, Smith arrested A.R. for prostitution.

Post-Miranda, Smith interviewed A.R. She admitted to working as a prostitute. When questioned about her pimp, A.R. immediately burst into tears and blurted out, "His name is Shawn Sylvester Clark, but he can't know I'm talking to you!" A.R. tearfully described her relationship with Clark. She described him as her boyfriend. Several months prior, Clark had approached her and asked her to help him earn some money. Wanting to please him, she agreed to work as a prostitute for him. At first Clark had her walking Pacific Hwy as a street prostitute, but he soon instructed her on how to place ads on craigslist.

A.R. was able to make about \$500 to \$1000 a day. Clark would stop by each day for about ten minutes to collect her earnings. She was required to give all her money to him, minus



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the amount needed for the motel room. There were times when she had to lie to Clark about the cost of the room, inflating the cost so she would have enough money left to eat and buy toiletries after she paid for the room.

A.R. described a time during June and July when she lived with Clark at 10439 Des Moines Memorial Drive. During that time frame, she conducted acts of prostitution out of the house along with another girl. She identified the girl by name as S.A.. A.R. said that S.A. worked for Gerald Jackson, a close associate of Clark. S.A. gave all her earnings to Jackson; A.R. gave all her earnings to Clark. A.R. said that all four lived in the house together: her, S.A., Clark, and Jackson. A.R. moved out after a domestic violence incident in July in which Clark punched her in the head and dragged her by her hair.

After their break up in July, Clark called A.R. and asked her to come back to him. He told her she would have to continue earning money to give to him so he could pay his defense attorney's fee in the pending DV case with her as the victim. Clark told her he needed \$5000 for his attorney. A.R. said that she earned the money for him, through prostitution, but the cash was stolen during a home invasion robbery at Clark's mother's house. A.R. reported that since his money was stolen in the robbery, Clark now deposits his illegal proceeds from prostitution in a bank.

A.R. described a very stormy relationship with Clark. When she rebelled against him, Clark would beat her by punching her in the head so there would be no marks on her face. Clark would demand that she prostitute herself in order to get back together with him. Since the DV incident, Clark will not allow A.R. to live with him at the house because of the no-contact order in place. For this reason, she has to work from motels. However, he continued to contact her on



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a daily basis to collect her earnings, including throughout the month of September after the issuance of the DV no-contact order that prohibited him from doing so.

A.R. also told Smith that she had previously been involved in prostitution with another female named J.K. (dob 12-22-1988). A.R. reported that J.K. advertised her prostitution services on the internet using the name "Jae."

A.R. named all involved parties by first and last name. She also provided the exact address of the house. She provided a taped statement.

Many details of A.R.'s story are confirmed by police reports in the KCSO database: incident number 08-177948 documenting the DV incident in July 2008 where Clark punched A.R. in the head in violation of a DV No-Contact Order; incident # 08-213143 documenting the home invasion robbery at Clark's mother's house.

Also, Smith located internet prostitution ads for a female calling herself "Lady Jae." Her ads contained clear photos of her face, which Smith compared to J.K.'s WA driver's license photo. The comparison confirmed that Lady Jae is J.K.. According to KCSO incident report 09-001860 and KCSO Gang Unit detectives, J.K. is the boyfriend of Desmond Manago, a documented associate of West Side Street Mobb. The report also links J.K. with A.W. (dob 2-6-1989), another known prostitute also associated with both Desmond Manago and validated West Side Street Mobb gang member Thomas Lamarreo Foster.

On 10-24-08, Det. Smith applied for and was granted a search warrant to search for bank accounts and records for Shawn Clark at Bank of America. He obtained records for Clark's Bank of America account for the period of September 2<sup>nd</sup> through October 23<sup>rd</sup>. During that period, Clark made a total of ten cash deposits to his checking and savings accounts. Total of



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these deposits was \$8320. This period is also one in which Clark was profiting from his ongoing promotion of prostitution, specifically from monies received from A.R. and J.Z.. During that same time period, Clark used his checking account-linked debit card to make nine point-of-sale payments to four different local motels for a total of \$1495.48 in motel charges. Two of these transactions were payments to two different motels on the same day, Holiday Inn and Ramada Inn on October 1<sup>st</sup>. There is no evidence that Clark has any legitimate employment. According to WA Employment Security, his total reported wages for 2007 and 2008 is \$70.13.

Under penalty of perjury under the laws of the State of Washington, I certify that the foregoing is true and correct to best of my knowledge and belief. Signed and dated by me this 10<sup>th</sup> day of MARCH, 2009, at Seattle, Washington.

