

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



SEATTLE  
POLICE  
DEPARTMENT

**CERTIFICATION FOR DETERMINATION  
OF PROBABLE CAUSE**

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| GENERAL OFFENSE #<br>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 Gerald Jackson committed the crime(s) of Promoting Prostitution 2<sup>nd</sup> degree 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.

**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,



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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 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.



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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 associate Gerald Jackson are members of a street gang called "Westside Street Mobb." T.G. identified a young woman named S.A. (dob 9-14-1988) as being one of Gerald Jackson's prostitutes. T.G. has seen S.A. perform sexual acts for money at Jackson's direction. She has seen her turn over the money she has earned to Jackson. She has also seen S.A. with bruises on her face; black eyes and fat lips. S.A. has told her that Jackson caused her these injuries.

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 Clark and his prostitute J.Z., and Gerald Jackson, and Jackson's prostitute S.A.. 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. T.G. described to me how all three women would perform sexual acts for money on men and then give the money they earned to their respective pimps.



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**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 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



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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.

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



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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 a number of the women give the money 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.

**KCSO INVESTIGATION INTO GERALD JACKSON**

In September 2008, the King County Sheriff's Office Narcotics and Organized Crimes Unit (NOCU) began what was at the time an unrelated investigation into Shawn Sylvester Clark and Gerald Nathaniel Jackson for promoting prostitution. Detective Todd Smith was the case



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detective. Det. Smith and I have discussed our respective cases and shared information with each other about them.

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 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 discovered that Shawn Sylvester 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 Gerald Jackson as a known member of the Westside Street Mobb set of the Blood criminal street gang. Furthermore, it is Det. Gagliardi's opinion that Gerald Jackson's involvement in prostitution was committed for the benefit of, and in association with, the Westside Street Mobb criminal street gang.

**Gerald Jackson and S.A.**

Det. Smith first became aware of S.A. in the early stages of his investigation when he found a KCSO report from August 2008 documenting her residence at 10439 Des Moines Mem. Dr. S. In that report, #08-211269, S.A. was contacted there with Shawn Clark when she called to report a burglary. Smith also had an unconfirmed report that S.A. was also committing acts of prostitution at the location along with J.Z..



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On 10-09-08, Det. Smith checked craigslist and saw an ad for a female named Rose, later identified as S.A.. He called her number and spoke to a female who identified herself as Rose. She quoted her rates at \$300 per hour. Smith made a date with S.A.. She said she only had one condom left, a magnum. She asked Smith to bring more condoms because "most guys like to get two pops in an hour." Her statement about "two pops" is an obvious reference to two male orgasms. S.A. gave Smith directions to S 104<sup>th</sup> St. and Des Moines Mem Dr S, about one half block away from S.A.' residence. Smith did not go into the house because of officer safety concerns and cancelled the date.

On 10-10-08, Smith found a craigslist ad for A.R. He set up a date at a Tukwila motel and subsequently arrested her for prostitution. A.R. gave a taped statement in which she reported that both she and S.A. worked as prostitutes; that during the summer they lived at 10439 Des Moines Mem Dr. and committed acts of prostitution there. A.R. stated that Shawn Clark was her pimp, Gerald Jackson was S.A.' pimp, and all four had lived there together. S.A. gave all of her prostitution earnings to Jackson. A.R. identified all parties by full names and provided the address of the house.

On 10-20-08, Det. Smith located another craigslist ad for Rose. This ad contained her phone number and a photo clearly showing her face. After comparing that photo to S.A.' WA driver's license photo, Smith confirmed that Rose is S.A..

On 12-02-08, KCSO Metro Detective Scherk made contact at 10439 Des Moines Mem. Dr. S to investigate a report that the occupants had possession of an illegal AK-47 assault rifle. Scherk identified the occupants inside the residence as S.A. and Gerald Jackson.

On 12-02-08, Det. Smith checked TNA Board, a website for men to post reviews of escort services and for escorts to post advertisements for their services. He found both





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advertisements and reviews for J.Z., S.A., and A.R., known as Mary Jane, Rose, and Aubrey, respectively, to the forum members. The reviews were all clear that the three girls worked out of a dingy basement apartment near Tukwila/Burien. One reviewer/poster had seen all three there, on separate occasions. This poster, "horneyboy," called the location a "little whore house." "Horneyboy" described in great detail his sexual encounters with all three escorts. He linked all three reviews for comparison by fellow posters on the forum. "Horneyboy" reviewed A.R. on June 10<sup>th</sup>, S.A. on July 23<sup>rd</sup>, and J.Z. on November 4<sup>th</sup>, and he included photos of all three, with facial shots of J.Z. and A.R. Smith also found photos on TNA Board of S.A. (Rose) posing in the front yard of 10439 Des Moines Mem Dr S, confirming it as the "little whore house" described by reviewer "Horneyboy."

According to WA Department of Licensing, Gerald Jackson and S.A. each list their address as 10439 Des Moines Memorial Drive S.

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 16<sup>th</sup> day of March, 2009, at Seattle, Washington.

