



**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN FRANCISCO**

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Case Number: CGC-19-574770

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COMPLAINT

JANE DOES #1 THROUGH #50, SEX TRAFFICKING SURVIVORS VS.  
SALESFORCE, INC., A DELAWARE CORPORATION AND

001C06739969

**Instructions:**

Please place this sheet on top of the document to be scanned.

**SUMMONS  
(CITACION JUDICIAL)**

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

SALESFORCE.COM, INC., a Delaware corporation and a California citizen

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

JANE DOES #1 through #50, sex trafficking survivors

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California, ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:  
(El nombre y dirección de la corte es): Superior Court, County of San Francisco  
400 McAllister St., Rm. 103  
San Francisco, CA 94102-4514

CASE NUMBER:  
(Número del Caso):

CGC - 19 - 574770

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:  
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):  
Matthew S. Parnet, ANNIE McADAMS, PC, 1150 Bissonnet St., Houston, TX 77005, phone 713 785 6262

DATE:  
(Fecha)

MAR 25 2019 CLERK OF THE COURT

Clerk, by  
(Secretario)

Deputy  
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)  
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010).)

DE LA VEGA-NAVARRO, Rossaly

**NOTICE TO THE PERSON SERVED: You are served**

- 1.  as an individual defendant
- 2.  as the person sued under the fictitious name of (specify):

- 3.  on behalf of (specify): Salesforce.com, Inc.

- under:  CCP 416.10 (corporation)  CCP 416.60 (minor)
- CCP 416.20 (defunct corporation)  CCP 416.70 (conservatee)
- CCP 416.40 (association or partnership)  CCP 416.90 (authorized person)
- other (specify):

- 4.  by personal delivery on (date):

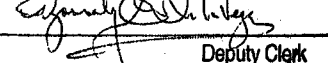
**BY FAX**  
ONE LEGAL LLC



**FILED**  
San Francisco County Superior Court

MAR 25 2019

CLERK OF THE COURT

BY:   
Deputy Clerk

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10 SUPERIOR COURT OF CALIFORNIA  
11 COUNTY OF SAN FRANCISCO

CGC-19-574770

ANNIE MCADAMS, PC

12 JANE DOES #1 through #50, sex trafficking  
13 survivors,

14 Plaintiffs

15 vs.

16 SALESFORCE, INC., a Delaware  
17 corporation and a California citizen,

18 Defendant

Case No. \_\_\_\_\_

Plaintiffs' Original Complaint for  
Damages (with Jury Demand)

1. Sex trafficking (CAL. CIV. CODE § 52.5);
2. Negligence;
3. Negligence per se;
4. Gross Negligence; and
5. Civil Conspiracy.

21 BY FAX  
22 ONE LEGAL LLC

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28 **Attorneys for Plaintiffs**

SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN FRANCISCO

JANE DOES #1 through #50, sex trafficking survivors,

Plaintiffs

vs.

SALESFORCE, INC., a Delaware corporation and a California citizen,

Defendant

Case No. \_\_\_\_\_

**Plaintiffs' Original Complaint for Damages (with Jury Demand)**

- 6. Sex trafficking (CAL. CIV. CODE § 52.5);**
- 7. Negligence;**
- 8. Negligence per se;**
- 9. Gross Negligence; and**
- 10. Civil Conspiracy.**

SUMMARY

1. Sex trafficking has hit epidemic proportions in our communities, and it has had a devastating effect on the victims and a crushing financial effect on our world.

2. The biggest forum of sex trafficking in the United States has undisputedly been the website Backpage.

3. The fight against Backpage and online sex trafficking gained prominence in 2008.

4. California was one of the early leaders in the public fight against Backpage and its executives. The California Legislature drafted and passed forward-thinking anti-trafficking legislation. Meanwhile, the Attorney General of California (at the time, Senator Kamala Harris) was fighting Backpage with lawsuits and arrests of Backpage executives.

5. By 2013, the fight had picked up momentum with 47 state attorneys general, including California's, coming together to recognize Backpage as the "hub of human trafficking" and recommending Backpage be shut down.

6. Despite the growing public outcry and efforts to shut down Backpage, Salesforce stepped in at the same time to help Backpage survive and even grow.

7. In public, including on Twitter, Salesforce boasted about fighting human trafficking using its data tools.

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1 8. But behind closed doors, Salesforce’s data tools were actually providing the  
2 backbone of Backpage’s exponential growth.

3 9. Salesforce didn’t just provide Backpage with a customer-ready version of its  
4 data and marketing tools. Salesforce designed and implemented a heavily customized  
5 enterprise database tailored for Backpage’s operations, both locally and internationally.

6 10. With Salesforce’s guidance, Backpage was able to use Salesforce’s tools to  
7 market to new “users”—that is, pimps, johns, and traffickers—on three continents.

8 11. Backpage could also use Salesforce’s custom tools to remarket to those pimps,  
9 johns, and traffickers who had been underusing its trafficking services.

10 12. It is inconceivable that the technologies used world-round to manage customer  
11 and marketing databases would be put to the immoral and illegal purposes engineered by  
12 Backpage and Salesforce.

13 13. It should not be our tax dollars, charities, and churches that carry the burden  
14 of the catastrophic harms and losses to sex trafficking survivors. That responsibility should  
15 fall to companies like Salesforce, that have facilitated and profited from sex trafficking.

16 14. Salesforce knew the scourge of sex trafficking because it sought publicity for  
17 trying to stop it. But at the same time, this publicly traded company was, in actuality, among  
18 the vilest of rogue companies, concerned only with their bottom line.

19 15. And human beings—many more than just these 50—were raped and abused  
20 because of it.

21 **JURISDICTION & VENUE**

22 16. Venue is proper in this Court pursuant to California Code of Civil Procedure  
23 section 395(a) because Salesforce resides in the County of San Francisco.

24 17. The Jane Does’ damages are in excess of the minimum jurisdictional limits of  
25 this Court.

26 **THE PARTIES**

27 18. Jane Doe #1 is a natural person who is a resident and citizen of Sacramento,  
28 California.

- 1           19.   Jane Doe #2 is a natural person who is a resident and citizen of Cincinnati,  
2 Ohio.
- 3           20.   Jane Doe #3 is a natural person who is a resident and citizen of Livingston,  
4 California.
- 5           21.   Jane Doe #4 is a natural person who is a resident and citizen of Baltimore,  
6 Maryland.
- 7           22.   Jane Doe #5 is a natural person who is a resident and citizen of Cincinnati,  
8 Ohio.
- 9           23.   Jane Doe #6 is a natural person who is a resident and citizen of Pittsburg,  
10 California.
- 11          24.   Jane Doe #7 is a natural person who is a resident and citizen of Orange, Texas.
- 12          25.   Jane Doe #8 is a natural person who is a resident and citizen of Milwaukee,  
13 Wisconsin.
- 14          26.   Jane Doe #9 is a natural person who is a resident and citizen of Danville,  
15 Illinois.
- 16          27.   Jane Doe #10 is a natural person who is a resident and citizen of Kansas City  
17 Missouri.
- 18          28.   Jane Doe #11 is a natural person who is a resident and citizen of Kannapolis,  
19 North Carolina.
- 20          29.   Jane Doe #12 is a natural person who is a resident and citizen of Baltimore,  
21 Maryland.
- 22          30.   Jane Doe #13 is a natural person who is a resident and citizen of Fresno,  
23 California.
- 24          31.   Jane Doe #14 is a natural person who is a resident and citizen of Seattle,  
25 Washington.
- 26          32.   Jane Doe #15 is a natural person who is a resident and citizen of Anchorage,  
27 Alaska.
- 28

ANNIE MCADAMS, PC

- 1           33.   Jane Doe #16 is a natural person who is a resident and citizen of Apple Valley,  
2 California.
- 3           34.   Jane Doe #17 is a natural person who is a resident and citizen of St. Johnsbury,  
4 Vermont.
- 5           35.   Jane Doe #18 is a natural person who is a resident and citizen of Seattle,  
6 Washington.
- 7           36.   Jane Doe #19 is a natural person who is a resident and citizen of Seattle,  
8 Washington.
- 9           37.   Jane Doe #20 is a natural person who is a resident and citizen of Lithonia,  
10 Georgia.
- 11          38.   Jane Doe #21 is a natural person who is a resident and citizen of Camden,  
12 North Carolina.
- 13          39.   Jane Doe #22 is a natural person who is a resident and citizen of Rochester,  
14 New York.
- 15          40.   Jane Doe #23 is a natural person who is a resident and citizen of Phoenix,  
16 Arizona.
- 17          41.   Jane Doe #24 is a natural person who is a resident and citizen of Longview,  
18 Washington.
- 19          42.   Jane Doe #25 is a natural person who is a resident and citizen of Chicago,  
20 Illinois.
- 21          43.   Jane Doe #26 is a natural person who is a resident and citizen of New Orleans,  
22 Louisiana.
- 23          44.   Jane Doe #27 is a natural person who is a resident and citizen of Martinez,  
24 California.
- 25          45.   Jane Doe #28 is a natural person who is a resident and citizen of Antioch,  
26 California.
- 27          46.   Jane Doe #29 is a natural person who is a resident and citizen of Milwaukee,  
28 Wisconsin.



ANNIE MCADAMS, PC

1           47.   Jane Doe #30 is a natural person who is a resident and citizen of Reading,  
2   Pennsylvania.

3           48.   Jane Doe #31 is a natural person who is a resident and citizen of Bangor,  
4   Maine.

5           49.   Jane Doe #32 is a natural person who is a resident and citizen of Minneapolis,  
6   Minnesota.

7           50.   Jane Doe #33 is a natural person who is a resident and citizen of Coweta,  
8   Oklaoma.

9           51.   Jane Doe #34 is a natural person who is a resident and citizen of Staten Island,  
10   New York.

11          52.   Jane Doe #35 is a natural person who is a resident and citizen of Minneapolis,  
12   Minnesota.

13          53.   Jane Doe #36 is a natural person who is a resident and citizen of Hamilton,  
14   New Jersey.

15          54.   Jane Doe #37 is a natural person who is a resident and citizen of Jacksonville,  
16   Florida.

17          55.   Jane Doe #38 is a natural person who is a resident and citizen of Athens,  
18   Georgia.

19          56.   Jane Doe #39 is a natural person who is a resident and citizen of Neenah,  
20   Wisconsin.

21          57.   Jane Doe #40 is a natural person who is a resident and citizen of Bakersfield,  
22   California.

23          58.   Jane Doe #41 is a natural person who is a resident and citizen of Annandale,  
24   Virginia.

25          59.   Jane Doe #42 is a natural person who is a resident and citizen of Pittsburg,  
26   California.

27          60.   Jane Doe #43 is a natural person who is a resident and citizen of North  
28   Jackson, Ohio.

1           61.   Jane Doe #44 is a natural person who is a resident and citizen of Yakima,  
2 Washington.

3           62.   Jane Doe #45 is a natural person who is a resident and citizen of Penrose,  
4 California.

5           63.   Jane Doe #46 is a natural person who is a resident and citizen of Cambridge,  
6 Minnesota.

7           64.   Jane Doe #47 is a natural person who is a resident and citizen of Saco, Maine.

8           65.   Jane Doe #48 is a natural person who is a resident and citizen of Valdosta,  
9 Georgia.

10          66.   Jane Doe #49 is a natural person who is a resident and citizen of Portland,  
11 Oregon.

12          67.   Jane Doe #50 is a natural person who is a resident and citizen of Cleveland,  
13 Ohio.

14          68.   Jane Does #1 through #50 are referred to jointly as the “Jane Does.”

15          69.   The Jane Does prosecute this action under fictitious names for good cause. (*See*  
16 *Doe v. Sup. Ct.* (2d Dist. 2011) 194 Cal.App.4th 750, 752-53.)

17          70.   For example, identification of the Jane Does may create a risk of retaliatory  
18 physical or mental harm. (*Doe v. Lincoln Unified Sch. Dist.* (1st Dist. 2010) 188 Cal.App.4th  
19 758, 766-67.)

20          71.   Anonymity of the Jane Does is also necessary to protect privacy for the  
21 sensitive and highly personal matters as they relate to the Jane Does. (*Id.*)

22          72.   The Jane Does’ need for anonymity outweighs the prejudice, if any, to opposing  
23 parties. (*Id.*)

24          73.   The Jane Does’ need for anonymity outweighs the public’s interest in knowing  
25 her identity. (*Id.*)

26          74.   Salesforce.com, Inc. (“Salesforce”) is a foreign corporation organized under the  
27 laws of Delaware.  
28



1           **B.     Backpage was the biggest and most notorious sex trafficking website in the**  
2                           **United States.**

3           82.     With the help of online advertising, pimps and traffickers can maximize profits,  
4 evade law enforcement detection, and maintain control of victims by transporting them  
5 quickly between locations.

6           83.     Online advertising has transformed the commercial sex trade, and in the  
7 process, has contributed to the explosion of domestic sex trafficking.

8           84.     Sex trafficking previously took place (and continues to through the aid of online  
9 advertising) on the streets, casinos, truck stops, and in other physical locations. Now, most sex  
10 trafficking, including the trafficking of the Jane Does, is facilitated online.

11          85.     Backpage was the leading online marketplace for commercial sex and sex  
12 trafficking.

13          86.     The National Association of Attorneys General aptly described Backpage as a  
14 “hub” of “human trafficking, especially the trafficking of minors.”

15           **C.     The Jane Does were sexually exploited and trafficked through Backpage.**

16          87.     Each Jane Doe was sexually exploited through the use of Backpage.

17          88.     Traffickers, pimps, and johns all communicated with one another on Backpage.

18          89.     Through ads posted on Backpage by pimps and traffickers, the Jane Does were  
19 caused by any means into sex trafficking and sexual exploitation and suffered as well as  
20 continue to suffer significant harms and losses as a result.

21           **D.     Salesforce steps in to help build Backpage.**

22          90.     As Backpage’s user levels stalled in 2013, Backpage set its sights on growth.  
23 Enter Salesforce.

24          91.     In December 2013, Salesforce took on Backpage as a client and helped  
25 Backpage thrive and operate on a much larger scale than ever before.

26          92.     While Backpage had the idea on how to make millions of dollars trafficking  
27 victims and promoting prostitution, it did not have the ability to put its online marketing and  
28 advertising platform into action without operational and marketing support and guidance.

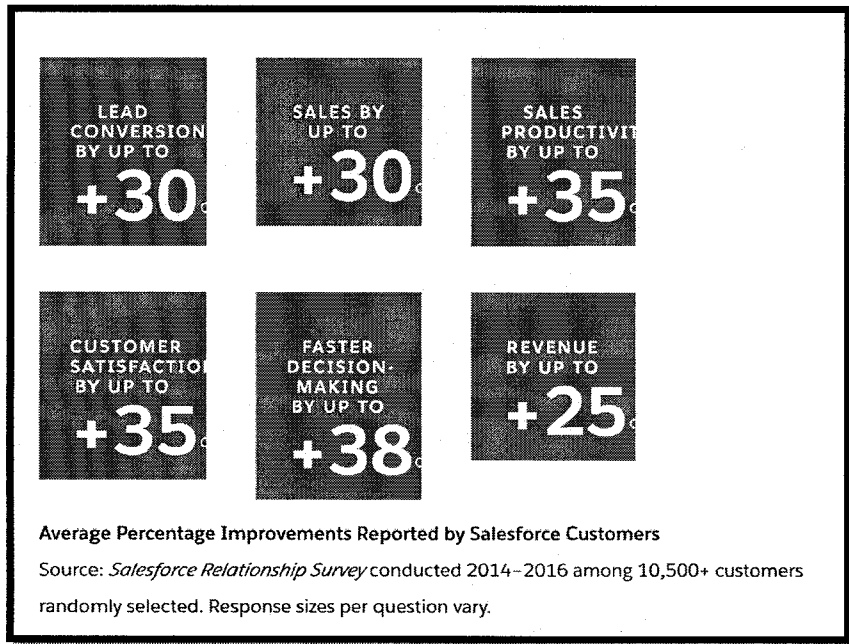
1 93. Backpage needed operational support through a customer relationship  
2 management (“CRM”) to help maximize not only customer acquisition and retention, but  
3 marketing strategies to those customers as well.

4 94. Salesforce advertises itself as a company that can drive business growth through  
5 the use of customer relationship management, market, service, analytics, and other support  
6 applications and technology.

7 95. Salesforce often has referred to its services as offering a complete “architecture  
8 that empowers every business” for the businesses it enters ventures with. (Product Habits,  
9 How Salesforce Built a \$10 Billion Empire from a CRM,  
10 <https://producthabits.com/salesforce-built-10-billion-empire-crm/> (last accessed Mar. 18,  
11 2019)).

12 96. The Salesforce CRM platform, which is designed and administered by  
13 Salesforce, has the goal of “find new customers, win their business, and keep them happy and  
14 grow your business faster.” (Salesforce, CRM 101, What is CRM?,  
15 <https://www.salesforce.com/crm/what-is-crm/> (last accessed Mar. 18, 2019)).

16 97. Salesforce boasts that using its services and CRM has proven track record of  
17 increasing business:



1            98. CRM, or Customer Relationship Management, is a type of software developed  
2 and utilized by Salesforce to drive the growth of the companies it has contracts and ventures  
3 with by providing operational support.

4            99. Publicly, Salesforce took credit for using its CRM to help fight human  
5 trafficking:



ANNIE MCADAMS, PC


1  **Salesforce**   
 2 @salesforce Follow 

3 **Fighting Human Trafficking With Big Data**  
 4 [bddy.me/10Zsx6a](http://bddy.me/10Zsx6a) /via @FastCoExist

5  
 6 11:46 AM - 12 Apr 2013

7 100. Behind the scenes, however, Salesforce kept taking Backpage's money and  
 8 supporting it with the CRM database of pimps, johns, and traffickers that Backpage needed  
 9 to operate:

ANNIE MCADAMS, PC

11  **salesforce.com, inc.**  
 12 San Francisco, CA 94105  
 13 United States

14 ORDER FORM for [REDACTED]  
 15 Offer Valid Through: 11/30/2016  
 16 Proposed by [REDACTED]  
 17 Quote Number: Q-00876957

18 **ORDER FORM**

---

19 **Address Information**

|   |   |
|---|---|
| 20 <b>Bill To:</b><br>21 2501 Oak Lawn Suite 700<br>22 Dallas<br>23 TX, 75223<br>24 US - United States                                      | <b>Ship To:</b><br>25 2501 Oak Lawn Suite 700<br>26 Dallas<br>27 TX, 75223<br>28 US - United States |
| <b>Billing Company Name:</b> [REDACTED]<br><b>Billing Contact Name:</b> [REDACTED]<br><b>Billing Email Address:</b> [REDACTED]@backpage.com | <b>Billing Phone:</b> (469) 317-6002<br><b>Billing Fax:</b><br><b>Billing Language:</b> English     |

---

29 **Terms and Conditions**

|   |  |
|---|--|
| 30 <b>Contract Start Date*:</b> 12/13/2016<br>31 <b>Contract End Date*:</b> 12/12/2018<br>32 <b>Billing Frequency:</b> Annual | <b>Payment Method:</b> Check<br><b>Payment Terms:</b> Net 30<br><b>Billing Method:</b> Email |
|---|--|

1           101. Salesforce's CRM successfully provided the following tools to Backpage,  
2 leading to Backpage's exponential growth:

- 3           • Creating custom SMS platforms for Backpage to contact and procure  
4 customers;
- 5           • Creating a custom data deduplication tool for Backpage's use;
- 6           • Creating a custom API to Backpage's servers;
- 7           • Creating a custom PPI for Backpage's payment systems;
- 8           • Identifying and categorizing sales opportunities to traffickers and pimps for  
9 Backpage;
- 10          • Identifying and increasing referrals from existing traffickers and pimps using  
11 Backpage by creating cross-selling and upselling opportunities;
- 12          • Managing marketing campaigns to traffickers and pimps for Backpage;
- 13          • Managing trafficker and pimp histories of Backpage including their previous  
14 history with Backpage, any outstanding customer issues, and more;
- 15          • Gathering and managing information from Backpage's traffickers' and pimps'  
16 public social media activity, including but not limited to their likes and dislikes  
17 and what they are saying and sharing about Backpage and its competitors;
- 18          • Providing and managing Backpage's trafficker and pimp database as well as  
19 tracking and collecting trafficker and john data across multiple platforms  
20 including phone, email, and social media;
- 21          • Collecting and managing traffickers' and pimps' data across multiple sources  
22 and channels and using this information to promote Backpage;
- 23          • Automatically generating insights into traffickers' and pimps' purchasing habits  
24 to help Backpage understand the traffickers and johns better and predicting how  
25 they will feel and act so Backpage could prepare the right outreach;
- 26          • Providing and managing a secure cloud storage database for Backpage to store  
27 (and secure) the unspeakable details of its sex trafficking business; and  
28



- 1 • Providing and managing marketing strategies for Backpage to pimps and  
2 human traffickers.

3 102. Salesforce had a financial incentive for Backpage to grow its trafficking empire  
4 under its care and guidance during the length of Salesforce and Backpage's venture.

5 103. With the assistance it was providing, Salesforce watched Backpage grow before  
6 its eyes. As Backpage implemented Salesforce's tools and platforms, its need for additional  
7 Salesforce licences kept increasing.

8 104. As Backpage grew, so did its CRM's need to manage the traffickers and johns  
9 with which it did business, leading to higher priced contracts with Salesforce.

10 105. This profit motivation led to Salesforce continuing its relationship with  
11 Backpage and facilitating Backpage's growth despite knowing what Backpage was being used  
12 for, that several Backpage officials were indicted for facilitating trafficking, and that the Senate  
13 Subcommittee had declared Backpage knowingly facilitated the sex trafficking of minors.

14 106. Salesforce does not deny the fact it has an ethical duty and obligation to prevent  
15 atrocities such as sex trafficking from being proliferated by its technology. As stated by  
16 Salesforce CEO and founder Marc Benioff:

17 Here at Salesforce, we have determined that this ethic(al) and humane  
18 use of technology, especially within the context of the Fourth Industrial  
19 Revolution, must be clearly addressed, not only by us, but by our entire  
20 industry. Our industry has reached an inflection point that must be  
21 supported by a strong set of guiding values.

22 We have to make sure that technology strengthens our societies, instead  
23 of weakening them. Technology needs to improve the human tradition,  
24 not undermine it.

25 107. Despite recognizing its duty to prevent human rights violations such as sex  
26 trafficking, Salesforce (in concert with Backpage) continued to use its platform and CRM to  
27 facilitate the growth of Backpage. Tell the public one thing; do another when no one is  
28 looking.

108. Salesforce continued to collect and process data, which directly assisted  
Backpage in causing the sexual exploitation and brutal rapes of an untold number of sex  
trafficking victims, including the Jane Does in this lawsuit.

1 109. Salesforce succeeded, and sex trafficking has exploded as a result of the internet  
2 marketplace for sexual assault and exploitation growing at an exponential rate.

3 110. Backpage posted huge profits with the knowledge, skills, and assistance of  
4 Salesforce, who also reaped profits from its own participation in this venture.

5 **FIRST CAUSE OF ACTION—SEX TRAFFICKING**

6 111. The Jane Does incorporate all other allegations.

7 112. At all relevant times, the Jane Does were and are victims within the meaning  
8 of California Civil Code section 52.5(a) and California Penal Code section 236.1.

9 113. At all relevant times, Salesforce was and is a person within the meaning of  
10 California Penal Code section 236.1(a)-(c).

11 114. Salesforce acted with Backpage to deprive and violate the personal liberty of  
12 the Jane Does.

13 115. The Jane Does were forced, coerced, and made victims of sex trafficking by  
14 means of force, fear, fraud, deceit, coercion, violence, duress, menace, or threat of unlawful  
15 injury to themselves and others, including family members.

16 116. Salesforce committed acts at issue with malice, oppression, fraud, and duress.  
17 CAL. CIV. CODE § 52.5(b); CAL. PENAL CODE § 236.1(h).

18 117. Salesforce’s CTVPA violations were a direct, producing, and proximate cause  
19 of the injuries and damages to the Jane Does.

20 **SECOND CAUSE OF ACTION—NEGLIGENCE**

21 118. The Jane Does incorporate all other allegations.

22 119. Salesforce had a duty to the general public and to persons affected by its  
23 products, including the Jane Does, to take reasonable steps to protect them from the  
24 foreseeable dangers of its products.

25 120. Salesforce failed to exercise ordinary care as would a reasonably prudent entity  
26 under the same circumstances.

27 121. Salesforce was also negligent in one or more of the following, non-exclusive  
28 particulars:

- 1 a. Failure to monitor for and safeguard from the use of its platform for
- 2 illegal activities, including sex trafficking;
- 3 b. Providing services to enable and further criminal activity, including sex
- 4 trafficking;
- 5 c. Failure to set forth guidelines to ensure the legal and safe use of its CRM
- 6 platforms and other services;
- 7 d. Failing to monitor its customer base to identify participation in an illegal
- 8 venture;
- 9 e. Allowing, permitting, and encouraging the use of its platform for the
- 10 exploitation of sex trafficking victims.

11 122. Salesforce’s negligent actions proximately caused legal injuries to the Jane  
 12 Does.

13 123. Each of Salesforce’s negligent acts and omissions, singularly or collectively,  
 14 constituted negligence and proximately caused legal injuries to the Jane Does.

15 **THIRD CAUSE OF ACTION—NEGLIGENCE PER SE**

16 124. The Jane Does incorporate all other allegations.

17 125. Salesforce’s acts and omissions violated various provisions of California law,  
 18 including the CTVPA.

19 126. Salesforce’s failure to comply with the standard of care set forth in these laws  
 20 constitutes negligence per se.

21 127. Each of Salesforce’s negligent acts and omissions, singularly or collectively,  
 22 constituted negligence per se and proximately caused legal injuries to the Jane Does.

23 **FOURTH CAUSE OF ACTION—GROSS NEGLIGENCE**

24 128. The Jane Does incorporate all other allegations.

25 129. Salesforce’s acts and omissions constitute gross neglect.

26 130. Viewed objectively from the standpoint of Salesforce at the time of the  
 27 incidents, Salesforce’s acts and omissions involved an extreme degree of risk, considering the  
 28 probability and magnitude of the potential harm to the Jane Does.

1           131.   Salesforce nevertheless evidenced conscious indifference to the rights, safety, or  
2 welfare of others, including the Jane Does.

3           132.   As a result of Salesforce's gross neglect, the Jane Does were exposed to and did  
4 sustain serious and grievous personal injury.

5           133.   Each of Salesforce's negligent acts and omissions, singularly or collectively,  
6 constituted gross negligence and proximately caused legal injuries to the Jane Does.

7           134.   Exemplary damages are warranted for Salesforce's gross negligence.

8                                   **FIFTH CAUSE OF ACTION—CIVIL CONSPIRACY**

9           135.   The Jane Does incorporate all other allegations.

10          136.   Salesforce entered into a civil conspiracy with Backpage.

11          137.   The conspiracy accomplished an unlawful purpose by unlawful means,  
12 including but not limited to, promoting and assisting human traffickers' sexual exploitation  
13 of minors, including but not limited to the Jane Does.

14          138.   Salesforce and Backpage had a meeting of the minds on the object of the  
15 conspiracy and its course of action.

16          139.   At least one or more of Salesforce and Backpage committed one or more  
17 unlawful, overt acts to further the conspiracy.

18          140.   The Jane Does suffered injury and damages as a direct and proximate result of  
19 Salesforce's wrongful acts.

20          141.   This civil conspiracy and Salesforce's individual, predicate misconduct,  
21 wrongful acts, and omissions, were a direct, producing, and proximate cause of the injuries  
22 and damages to the Jane Does.

23          142.   This civil conspiracy and Salesforce's individual, predicate misconduct,  
24 wrongful acts, and omissions, were a substantial factor in bringing about the injury and  
25 damages to the Jane Does.

26          143.   Without this civil conspiracy, and Salesforce's individual, predicate  
27 misconduct, wrongful acts, and omissions, the injury and damages would not have occurred.

28

1 144. A person of ordinary intelligence in Salesforce's position would have foreseen  
2 the damages resulting from this civil conspiracy and from Salesforce's individual, predicate  
3 misconduct, wrongful acts, and omissions.

4 **DAMAGES**

5 145. Salesforce's acts and omissions, individually and collectively, caused each Jane  
6 Doe to sustain legal damages.

7 146. The Jane Does are entitled to be compensated for all personal injuries and  
8 economic damages allowed under the CTVPA, including:

- 9 a. Actual damages;
- 10 b. Compensatory damages;
- 11 c. Punitive damages;
- 12 d. Attorneys' fees and costs; and
- 13 e. Treble damages.

14 147. The Jane Does are entitled to be compensated for personal injuries and  
15 economic damages allowed under law, including:

- 16 a. Actual damages;
- 17 b. Direct damages;
- 18 c. Incidental and consequential damages;
- 19 d. Unjust enrichment damages;
- 20 e. Mental anguish and emotional distress damages (until trial and in the  
21 future);
- 22 f. Necessary medical expenses (until trial and in the future);
- 23 g. Physical pain and suffering (until trial and in the future);
- 24 h. Physical impairment (until trial and in the future);
- 25 i. Disfigurement (until trial and in the future); and
- 26 j. Mental anguish (until trial and in the future).

27 148. The Jane Does are entitled to exemplary damages.

28 149. The Jane Does are entitled to treble damages.

ANNIE MCADAMS, PC

- 1           150. The Jane Does are entitled to recover attorneys' fees and costs of court.
- 2           151. The Jane Does are entitled to pre- and post-judgment interest at the maximum
- 3 legal rates.

JURY DEMAND

- 5           152. The Jane Does demand a trial by jury.

RELIEF SOUGHT

- 7           153. Wherefore, the Jane Does pray for judgment against Salesforce as follows:
- 8           a. For a judgment finding Salesforce liable damages and violations of law
- 9 as set forth herein;
- 10          b. For a judgment awarding the Jane Does attorneys' fees and costs;
- 11          c. For a judgment awarding the Jane Does pre- and post-judgment interest
- 12 at the highest rates allowed by law; and
- 13          d. For all such other and further relief as may be necessary and
- 14 appropriate.

15 Date: March 25, 2019

17 Respectfully submitted,

18 ANNIE MCADAMS, PC

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22 By: **Matthew S. Parmet**  
 23 **Matthew S. Parmet**  
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FOR COURT USE ONLY  
**FILED**  
San Francisco County Superior Court  
MAR 25 2019  
CLERK OF THE COURT  
BY: [Signature] Deputy Clerk

ATTORNEY FOR (Name): Plaintiffs  
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Francisco  
STREET ADDRESS: 400 McAllister St.  
MAILING ADDRESS:  
CITY AND ZIP CODE: San Francisco, CA 94102-4514  
BRANCH NAME:

CASE NAME:  
Jane Doe #1, et al. v. Salesforce.com, Inc.

**CIVIL CASE COVER SHEET**  
 Unlimited (Amount demanded exceeds \$25,000)  Limited (Amount demanded is \$25,000 or less)  
 Complex Case Designation  
 Counter  Joinder  
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:  
CGC-19-574770  
JUDGE:  
DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:
- |  |   |   |
|--|---|---|
| <b>Auto Tort</b><br><input type="checkbox"/> Auto (22)<br><input type="checkbox"/> Uninsured motorist (46)   | <b>Contract</b><br><input type="checkbox"/> Breach of contract/warranty (06)<br><input type="checkbox"/> Rule 3.740 collections (09)<br><input type="checkbox"/> Other collections (09)<br><input type="checkbox"/> Insurance coverage (18)<br><input type="checkbox"/> Other contract (37) | <b>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</b><br><input type="checkbox"/> Antitrust/Trade regulation (03)<br><input type="checkbox"/> Construction defect (10)<br><input type="checkbox"/> Mass tort (40)<br><input type="checkbox"/> Securities litigation (28)<br><input type="checkbox"/> Environmental/Toxic tort (30)<br><input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) |
| <b>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b><br><input type="checkbox"/> Asbestos (04)<br><input type="checkbox"/> Product liability (24)<br><input type="checkbox"/> Medical malpractice (45)<br><input checked="" type="checkbox"/> Other PI/PD/WD (23)   | <b>Real Property</b><br><input type="checkbox"/> Eminent domain/Inverse condemnation (14)<br><input type="checkbox"/> Wrongful eviction (33)<br><input type="checkbox"/> Other real property (26)   | <b>Enforcement of Judgment</b><br><input type="checkbox"/> Enforcement of judgment (20)   |
| <b>Non-PI/PD/WD (Other) Tort</b><br><input type="checkbox"/> Business tort/unfair business practice (07)<br><input type="checkbox"/> Civil rights (08)<br><input type="checkbox"/> Defamation (13)<br><input type="checkbox"/> Fraud (16)<br><input type="checkbox"/> Intellectual property (19)<br><input type="checkbox"/> Professional negligence (25)<br><input type="checkbox"/> Other non-PI/PD/WD tort (35) | <b>Unlawful Detainer</b><br><input type="checkbox"/> Commercial (31)<br><input type="checkbox"/> Residential (32)<br><input type="checkbox"/> Drugs (38)  | <b>Miscellaneous Civil Complaint</b><br><input type="checkbox"/> RICO (27)<br><input type="checkbox"/> Other complaint (not specified above) (42)   |
| <b>Employment</b><br><input type="checkbox"/> Wrongful termination (36)<br><input type="checkbox"/> Other employment (15)  | <b>Judicial Review</b><br><input type="checkbox"/> Asset forfeiture (05)<br><input type="checkbox"/> Petition re: arbitration award (11)<br><input type="checkbox"/> Writ of mandate (02)<br><input type="checkbox"/> Other judicial review (39)  | <b>Miscellaneous Civil Petition</b><br><input type="checkbox"/> Partnership and corporate governance (21)<br><input type="checkbox"/> Other petition (not specified above) (43)   |

2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- |  |  |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties   | d. <input type="checkbox"/> Large number of witnesses  |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence   | f. <input type="checkbox"/> Substantial postjudgment judicial supervision  |
3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive
4. Number of causes of action (specify): 5
5. This case  is  is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: March 25, 2019  
Matthew S. Parmet

[Signature: Matthew S. Parmet]  
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.



## INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

**To Plaintiffs and Others Filing First Papers.** If you are filing a first paper (for example, a complaint) in a civil case, you must complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In Item 1, you must check one box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

**To Parties in Rule 3.740 Collections Cases.** A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

**To Parties in Complex Cases.** In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

## CASE TYPES AND EXAMPLES

## Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death  
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

## Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)  
Asbestos Property Damage  
Asbestos Personal Injury/Wrongful Death  
Product Liability (*not asbestos or toxic/environmental*) (24)  
Medical Malpractice (45)  
Medical Malpractice—  
Physicians & Surgeons  
Other Professional Health Care Malpractice  
Other PI/PD/WD (23)  
Premises Liability (e.g., slip and fall)  
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)  
Intentional Infliction of Emotional Distress  
Negligent Infliction of Emotional Distress  
Other PI/PD/WD

## Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)  
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)  
Defamation (e.g., slander, libel) (13)  
Fraud (16)  
Intellectual Property (19)  
Professional Negligence (25)  
Legal Malpractice  
Other Professional Malpractice (*not medical or legal*)  
Other Non-PI/PD/WD Tort (35)

## Employment

Wrongful Termination (36)  
Other Employment (15)

## Contract

Breach of Contract/Warranty (06)  
Breach of Rental/Lease  
Contract (*not unlawful detainer or wrongful eviction*)  
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)  
Negligent Breach of Contract/Warranty  
Other Breach of Contract/Warranty  
Collections (e.g., money owed, open book accounts) (09)  
Collection Case—Seller Plaintiff  
Other Promissory Note/Collections Case  
Insurance Coverage (*not provisionally complex*) (18)  
Auto Subrogation  
Other Coverage  
Other Contract (37)  
Contractual Fraud  
Other Contract Dispute

## Real Property

Eminent Domain/Inverse Condemnation (14)  
Wrongful Eviction (33)  
Other Real Property (e.g., quiet title) (26)  
Writ of Possession of Real Property  
Mortgage Foreclosure  
Quiet Title  
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

## Unlawful Detainer

Commercial (31)  
Residential (32)  
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

## Judicial Review

Asset Forfeiture (05)  
Petition Re: Arbitration Award (11)  
Writ of Mandate (02)  
Writ—Administrative Mandamus  
Writ—Mandamus on Limited Court Case Matter  
Writ—Other Limited Court Case Review  
Other Judicial Review (39)  
Review of Health Officer Order  
Notice of Appeal—Labor  
Commissioner Appeals

## Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)  
Construction Defect (10)  
Claims Involving Mass Tort (40)  
Securities Litigation (28)  
Environmental/Toxic Tort (30)  
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

## Enforcement of Judgment

Enforcement of Judgment (20)  
Abstract of Judgment (Out of County)  
Confession of Judgment (*non-domestic relations*)  
Sister State Judgment  
Administrative Agency Award (*not unpaid taxes*)  
Petition/Certification of Entry of Judgment on Unpaid Taxes  
Other Enforcement of Judgment Case

## Miscellaneous Civil Complaint

RICO (27)  
Other Complaint (*not specified above*) (42)  
Declaratory Relief Only  
Injunctive Relief Only (*non-harassment*)  
Mechanics Lien  
Other Commercial Complaint Case (*non-tort/non-complex*)  
Other Civil Complaint (*non-tort/non-complex*)

## Miscellaneous Civil Petition

Partnership and Corporate Governance (21)  
Other Petition (*not specified above*) (43)  
Civil Harassment  
Workplace Violence  
Elder/Dependent Adult Abuse  
Election Contest  
Petition for Name Change  
Petition for Relief From Late Claim  
Other Civil Petition