



3. When I was nine months old, my father's grandmother took me on vacation with her. When we returned two weeks later, my mother had disappeared. I found out later that she had been arrested after getting into a fight with someone in the neighborhood. Because she couldn't make bail, my brothers and sisters had been taken from the home and put in foster care. Upon learning this, my grandmother took custody of me and became the one who raised me throughout my childhood and young adulthood.

4. When I was seven years old, my grandmother moved us in with her boyfriend in the [REDACTED] section of [REDACTED]. Shortly after we moved in, my grandmother's boyfriend began sexually abusing me. Although I didn't understand what he was doing at the time, I knew it was wrong and that it made me feel dirty. I was afraid to tell my grandmother because they were supposed to get married, and I didn't want to upset her.

5. We moved again when I was nine years old, this time to a house off of [REDACTED] in [REDACTED] [REDACTED]. Because my grandmother was working two jobs to support us, it was her boyfriend's job to watch me when she wasn't home. I didn't feel safe around him because of what he had done to me, so to avoid being home alone with him, I started hanging out with some of the local neighborhood kids.

6. It was around that time that I was first introduced to alcohol and marijuana, which I quickly learned made all the bad thoughts in my head go away. This was the beginning of a pattern of addiction that I would struggle with for my entire life.

7. A few years later when I was twelve years old, I was hanging out with an older teenage girl from the neighborhood. She took me to an apartment nearby, where she told me to wait while she met up with a boy she liked. That afternoon, an

older man in that same apartment sexually assaulted me. I don't remember the attack clearly; instead, I closed my eyes and pretended I wasn't there. After the assault, I felt used and unlovable. I had always been taught that sex was something to be given to the right person, like a precious jewel. I didn't have that jewel to give anymore, and I hated myself for it.

8. Shortly after I was assaulted, I started dating a boy from the neighborhood named [REDACTED]. He was 17, but he lied and told me he was 14. The first time we had sex I didn't really want to, but by that time I didn't think it mattered very much what I wanted when it came to sex. [REDACTED] was physically violent toward me and abused me emotionally. He also provided me with alcohol and marijuana, even though he knew how young I was.

9. When I was 13, I got pregnant for the first time. I stopped attending school regularly because the school staff and the kids made me feel bad about being pregnant at such a young age. My school shipped me off to [REDACTED], which was a school for kids with behavior problems. The kids there teased me because I was pregnant, and so I transferred to [REDACTED]. I got a tutor and tried my best to stay in school.

10. On [REDACTED], I gave birth to my daughter, [REDACTED]. Despite my efforts to continue my education, I dropped out of school shortly after [REDACTED] birth. I had my second child, [REDACTED] III, on [REDACTED], when I was 16 years old. After [REDACTED] birth, I went back to school at [REDACTED],

now known as [REDACTED] High School. There I was able to receive both educational and career training, which I enjoyed.

11. That same year, I tried to get a job at a store near my house to earn some extra money. The owner asked me to come to the store to meet with him, but when I got there, he forced me to have sex with him at knifepoint. After the assault, I felt depressed and worthless. I felt powerless over my own body, as my life experiences taught me that I had no control over what people did to it.

## **II. Coping Through Addiction**

12. In the spring of [REDACTED], my family informed me that I had to marry [REDACTED] since I was then 18 and we already had two kids together. They wanted me to live like an “honest woman.” Unfortunately, our marriage was not a happy one. [REDACTED] was running the streets and would cheat on me regularly. When I got angry at him for how he was treating me, he would hit me.

13. When the violence became too much, I’d take the children from the apartment we shared and return to my grandmother, but I always ended up coming back. I knew the pain of being raised without a father, and I didn’t want [REDACTED] and [REDACTED] to have to grow up like I did. To cope with the sadness and anger I felt, I started drinking heavily. By the time I was 20, my relationship with [REDACTED] had ended completely, and I moved back in with my grandmother.

14. In [REDACTED], I met a man named [REDACTED] from the neighborhood, who went by the nickname [REDACTED]. He had a stable job in construction, which made him different from the other men in the neighborhood. I liked being with [REDACTED] but he

became physically abusive when he was drunk. However, he provided for my kids and me in a way that [REDACTED] never did, so I stayed with him. By that time, I also thought violence was a normal part of any relationship, so instead of blaming him for hitting me, I blamed myself.

15. Over the next few years, I continued to date [REDACTED] and work as a personal care assistant. My drinking worsened, and I would often disappear for days at a time on a binge. I remember believing that I was going to die young just like my father did, so the way I treated my body became meaningless to me. I know now that this belief is a common symptom of Post-Traumatic Stress Disorder, although I did not receive treatment for this until much later in life. Counseling was never something that I had access to or was encouraged to seek by anyone in my life.

16. On [REDACTED] [REDACTED] [REDACTED], I had my third child, [REDACTED] Jr. After [REDACTED] Jr. was born, [REDACTED] violence toward me started increasing and we separated. Shortly after, I started using crack cocaine. Crack helped numb the emotional pain that the alcohol always had, and also made me feel alive and full of energy instead of sluggish and depressed like I did while using alcohol.

17. Although I was able to continue working as a personal care assistant during the first few years of my addiction, I would spend the weekends getting high. In my grandmother's neighborhood I was known as a junkie, but when I was getting high, I didn't feel judged.

18. As my addiction got worse, I lost my job and turned to exchanging sex for money to supply myself with drugs. I had learned from so many years of being

powerless over sex how to go numb and separate myself from the physical act. I had no self-esteem and just accepted that this was the way things were going to be for me.

### **III. Sobriety**

19. I was arrested in [REDACTED] for drug possession and sentenced to 18 months of drug rehab, but I only completed 6 months before I relapsed again. I didn't return to rehab until [REDACTED], but that year I finally completed the program. I was sick of feeling like a junkie and I committed to staying clean.

20. Shortly after getting sober I moved back in with my grandmother and got a job working with the elderly. I maintained my sobriety through my faith in God, the skills I learned in rehab, and the need to rise above how I was living before. I also reunited with [REDACTED] and moved back in with him in an apartment outside of [REDACTED] where I was physically separated from my old life. I was happy for what felt like the first time in decades.

21. My life was stable and routine until early [REDACTED], when my daughter [REDACTED] took her children and moved down to Atlanta. Soon after they arrived, one of my granddaughters called me and said that they were homeless and sleeping on the street. I was terrified for them. I rented a van, drove down to Atlanta, and brought the kids back to Baltimore to live with me. [REDACTED] was very unhappy with my decision and forced me to choose between my grandkids and my life with him. I picked my grandkids.

22. I stayed at a family shelter with the children for two weeks, until a friend was able to rent me a house in [REDACTED], MD. Before we left the shelter, my

granddaughters went to stay with their aunt, while my middle grandson went to stay with his father. I kept the other three boys with me, who were 4, 5 and 7 at the time.

The house was comfortable for us, and there was a church nearby that the boys liked to go to. I was able to find a job working at an assisted living facility called ██████████ in ██████████, MD. Things were finally going smoothly again.

23. In late ██████████, ██████████ returned from Atlanta and moved in with me and the children. ██████████ was in and out of unstable relationships during the time she was living with me, and as a result, there was often violence taking place in the home and around the children. Although I begged ██████████ to leave or to let me leave and take the kids with me, she refused. In the spring of ██████████, I fled the house in ██████████ for my own safety.

24. I tried to move back in with ██████████ but he was still angry with me for picking my grandkids over him the year before. After a few months his anger turned into threats of violence, and he eventually kicked me out of the house. With nowhere else to go, I ended up back on the street.

#### **IV. Relapse and Exploitation**

25. I returned to my old neighborhood looking for a place to stay. Some acquaintances I used to do drugs with agreed to take me in because I was still working and able to pay them for a room in the house. The return to my old life caused me to become very depressed, and, because I was surrounded by people using drugs, I eventually relapsed after over ten years of sobriety.

26. In late [REDACTED], I lost my job at the assisted living facility. I tried living with [REDACTED] for a time, but our chaotic lifestyles caused stress between us, and she eventually kicked me out. Without any income to pay for a place to stay, I started trading sex for money again. I felt terrible about myself, like all the work I had done to make changes in my life was for nothing. I remember thinking that this must be all that was out there for me. My own family was doing nothing to care for me. And sex for money seemed to be all that anyone else wanted from me.

27. In early [REDACTED], I met a man named [REDACTED] at an acquaintance's house where I was hoping to be able to stay for the night. He told me he didn't like the way the people in the house were treating me, and encouraged me to leave with him. [REDACTED] said that he knew that I was trading sex for money and wanted to be my protection on the streets. I know now that traffickers operate by figuring out what vulnerable people need and use this information to exploit them, but back then, I jumped at the chance to have someone take care of me.

28. [REDACTED] was living in an abandoned row house in the [REDACTED] section of [REDACTED] that had a bed, a TV, and an electric heater that he kept running with electricity from a neighboring property. When I first moved in with him, we were both bringing in money to support ourselves and our drug habits. But soon enough, [REDACTED] revealed that because he was providing a place for me to stay, it was my job to bring in money for the both of us.

29. [REDACTED] had a gun and bragged about using it to rob stores and people in the neighborhood. If I didn't bring him enough money for him to get high, he would threaten me with it and refuse to let me sleep or eat until I went back out and earned him

the money he demanded. His behavior was completely unpredictable and I was terrified of him, but because I had no place to go, I stayed with him.

30. When I didn't earn enough money, I would try and rest in an alleyway or under the awning of an abandoned house because I was too afraid to go home without the amount he demanded. I never really slept much on those nights because it was the middle of the winter, and I had to get up and walk around every few hours so that I didn't freeze to death. I felt like a zombie. My entire life had become about making enough money so that [REDACTED] would let me inside to warm up and sleep for a few hours.

31. On [REDACTED], I was arrested for prostitution and drug possession near [REDACTED] in [REDACTED]. I wasn't able to afford bail so I stayed in jail until my court date ten days later. That day, I was told by my defense attorney that if I pled guilty I would be released that day. Being in jail for that long was scary and I was desperate to get out, so I took the plea. No one talked to me about how these convictions would impact me in the future, and I never told anyone about [REDACTED] because I was afraid of what he would do to me if I talked. After I was released from jail, I returned to him and the life he had forced upon me.

32. Soon after my arrest, I received my income tax money from the previous year when I had been working. In an effort to get some real rest for the first time in months, I rented a hotel room for the night. I didn't want [REDACTED] to stay with me, but he wouldn't take no for an answer. That night, he held me down in the hotel bed and raped me. I remember not resisting him, because I had learned from a lifetime of violence and sexual assault that if you fight it, you just get hurt.

33. After he assaulted me, I tried leaving him by avoiding the places I knew he hung around, but he always seemed to find me. During the times I was back under his control, he would force me to engage in sex acts for his benefit. He would also get physically violent with any man who looked at me but wasn't interested in being a customer. I was terrified of him.

34. I know now that [REDACTED] used my drug addiction and homelessness to control and profit off of me. Although he told me I was earning money through prostitution for the both of us, he is the only one who ever benefitted from it.

## **V. Recovery**

35. At some point in [REDACTED], I reconnected with my godmother. She had a room in her home and said that I could stay with her, as long as I was working to remain sober. With her help and support, I began cutting my use down to a few days a week. The days I allowed myself to recuperate did a lot for both my appearance as well as my self-esteem. Staying with my godmother also gave me a way to stay off the streets and safe from [REDACTED]

36. I started attending church at [REDACTED], and was honest with the congregation about my struggles with drug addiction. I started volunteering at the church, which helped me feel like my life might have a purpose again.

37. During a church service in [REDACTED], the pastor requested that the congregation pray for me to find what I needed to maintain my sobriety. Shortly after, she told me that a church member had made contact with a substance abuse program and had arranged for me to attend a recovery program there. I started my journey back to

sobriety at [REDACTED] in [REDACTED] for twenty-eight days of recovery. A copy of my Discharge Summary is attached as Exhibit C. After that, I transferred to [REDACTED] [REDACTED] to spend sixty days in a sober living program.

## **VI. Potential Hardships Resulting from Criminal Convictions**

38. Once I was successful in getting sober and exiting prostitution, I began working to return to nursing care, which has been my passion since I began working in the field in [REDACTED]. A copy of my Maryland Medical Assistant Program Notification of Provider is attached as Exhibit D. On [REDACTED], I completed a 140-hour Certified Nursing Assistant/Geriatric Nursing Assistant training through the [REDACTED] [REDACTED] at the [REDACTED] in [REDACTED] [REDACTED]. A copy of my certification is attached as Exhibit E.

39. Because of my drug and prostitution convictions however, I have not been able to find a job in nursing care. I have applied for jobs at both local and national retail chains in the [REDACTED] area, but have always been turned down after the employer conducted a background check on me. I take odd jobs now where I can get them because I don't want to put myself through the humiliation of getting turned down for yet another job. I know what people think when they see the charges I have been convicted of, and it hurts too much to think about putting myself through that again.

40. Because I have no stable source of income, I am forced to rely on friends for places to stay. This instability has made it hard to stay focused on what I know is important- getting a job and staying sober. It is easy for me to get overwhelmed

thinking about everything I have been through, but I am doing the best I can to stay strong.

41. I attend Narcotics and Alcoholics Anonymous meetings daily, many of which are held at the [REDACTED] in [REDACTED] [REDACTED]. I have also reconnected with my healthcare providers at [REDACTED], who started me on Gabapentin and Trazodone to treat my anxiety and depression. I am also seeing a counselor there regularly. A letter from my therapist, [REDACTED] is attached as Exhibit F.

42. For these reasons, I am now seeking to have my prostitution conviction vacated, as it represents obstacles to my future progress and success. This conviction bars me from specific types of employment and housing, and has other negative consequences for me. I have worked hard to move on from my painful past and begin life again, yet I am forced to endure the costs associated with a criminal record for conduct I was forced to engage in by my trafficker.

43. I respectfully request that this Honorable Court grant this motion and enter an order vacating the judgment of conviction for prostitution entered under Case No. [REDACTED] and shield the record of the associated drug conviction.

Wherefore, I declare under penalty of perjury, this \_\_ day of \_\_\_\_ 20█ in  
█, MD that the foregoing is true and correct to the best of my knowledge.

---

█

Sworn before me this \_\_\_\_\_ day of  
\_\_\_\_\_ 20█

---