



# Freedom Network USA

CRIMINAL COURT OF THE CITY OF NEW YORK  
COUNTY OF NEW YORK, PART AR6

-----X  
THE PEOPLE OF THE STATE OF NEW YORK,

- against -

AFFIDAVIT

Docket No.  
\_\_\_\_\_

CLIENT NAME,

Defendant.

-----X

**TO BE FILED UNDER SEAL PURSUANT TO CIVIL RIGHTS LAW § 50-B**

STATE OF NEW YORK

ss.:

COUNTY OF NEW YORK

CLIENT NAME, being duly sworn, deposes and says:

1. My name is CLIENT NAME, and I am the person prosecuted and convicted in the above-captioned docket. I submit this affidavit in support of the motion to vacate my prior criminal conviction because I was 16 years old and a victim of human trafficking at the time of my arrest and conviction.
2. I was born on May 13, 1995, in Queens County, New York.
3. When I was a minor, younger than 18 years old, I engaged in prostitution.
4. I was first induced to engage in prostitution when I was 11 years old. I had a difficult childhood and met an older man who introduced me to prostitution after he met me at a grocery store where I was trying to earn some money bagging and carrying



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groceries. I do not know this person's true name but he went by the nickname "Bones."

5. After Bones, several different men exploited me in prostitution as a minor for their own profit. For more than a decade after I was first forced to engage in prostitution at age 11, I would sell sexual conduct in exchange for money. Adult men induced me to engage in sexual conduct by providing me money in exchange. I would then give all the money I earned while engaging in prostitution to my traffickers.
6. Many of these traffickers used severe violence, and other forms of abuse, to make me learn the rules I was expected to follow when engaging in prostitution and to force me to earn them money.
7. I was first arrested in New York County on September 24, 2011 for Loitering for the Purpose of Engaging in Prostitution (P.L. §240.37). The same day, I pleaded guilty to and was convicted of that offense.
8. At the time of the arrest, I told the police that my date of birth was May 13, 1993 instead of 1995. I did so because my traffickers had always told me to lie about my age and that it was better if the Court and police thought I was 18 years old instead of 16. During my arrest and prosecution, I did not reveal my true age or date of birth to the police, the Court, or my attorney.
9. At the time of this arrest, I was being trafficked into prostitution by a man who controlled my movement, conduct, and money. Immediately after this arrest, he took me to Washington, D.C. to force me to engage in prostitution me there.



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10. I have many arrests on my record from my years of being trafficked. I have convictions on my record from Queens County and New York County, as well as arrested in Washington, D.C. and Arlington, Virginia. Most of these arrests occurred before I turned 18.
11. This case is the only conviction I have on my record from New York County even though I was forced to engage in prostitution in this jurisdiction many times over several years.
12. Since being trafficked, I have worked very hard to move forward with my life. I want to get a good job and support myself. My criminal record, however, affects me every time I apply for a job. It feels like I can never escape from my past because I must admit the convictions. I don't even want to think about them, but I am forced to.
13. Vacatur of these convictions would mean a lot to me because my record has stopped me from getting jobs that I have really wanted.
14. Vacatur of these convictions would allow me to have a second chance at life, and to help me move past difficult experiences I endured when I was a minor.

Dated: December \_\_, 2017

New York, New York

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CLIENT NAME



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Sworn to before me this \_\_\_ day of December 2017.

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NOTARY PUBLIC