

COMMONWEALTH OF MASSACHUSETTS
SUPREME JUDICIAL COURT

SUFFOLK, ss.

NO. SJ-2017-

COMMITTEE FOR PUBLIC COUNSEL SERVICES,
and others

v.

ATTORNEY GENERAL,
and others

Affidavit of Herschelle Reaves

I, Herschelle Reaves, state as follows:

1. I am a resident of [REDACTED], Massachusetts, which is just outside of Springfield.
2. I work two jobs. I am employed full-time with Behavioral Health Network as a care coordinator, and I am employed part-time with Mental Health Association as residential staff member.
3. I am also a community activist and organizer. For example, I have been an organizer with Arise for Social Justice, a member-led community organization in Springfield that is dedicated to defending and advancing the rights of poor people.
4. I have also authored a memoir: *B.O.S.S.: Broken Only Still Standing*.
5. I am active with a 12-step fellowship program for addiction. I initially surrendered to this program in 1996, shortly after my daughter was born. I stayed clean until 2005, when I suffered a relapse after letting go of my career to take care of my mother full-time. My mother passed in 2010. I resumed my recovery in 2014.
6. I am a lifelong resident of the Springfield area. In 1974, My mother Arlene Gladden-Reaves became the first woman, as well as the first Black woman, to serve as an officer in the Springfield Police Department. I was 8 years old. During her tenure as the "First Woman," I saw my mother endure brutal racism, sexism and classism. Watching her deal with those hardships

while I was just a young child gave me a full understanding of how the justice system can be stacked against people of color.

7. I am now a single parent. Watching my mother knock down barriers has molded me into the person I am today. Although I suffer from the disease of addiction, and have been involved in the criminal justice system because of my disease, I continue to strive in spite of it.

8. In my work as an organizer, I talk about my personal experiences with the justice system, including how it harms Black women like me.

9. One of my experiences with the justice system was a conviction in 2008, when I pled guilty to possession of a class B substance. *See Ex. 1* (Springfield District Court Docket Number 0823CR006842).

10. From personal experience, and from my work as an organizer, I know that criminal convictions have a devastating effect on people, especially people of color. They often result in incarceration, and their consequences stay with people for the rest of their lives.

11. On information and belief, I understand that former state chemist Sonja Farak signed a drug certificate as a chemist in my 2008 drug possession case. I have been told that the lab number is A08-00027.

12. I also have been told that Ms. Farak committed egregious misconduct while she worked at the Amherst drug lab, including when she worked on my case in 2008.

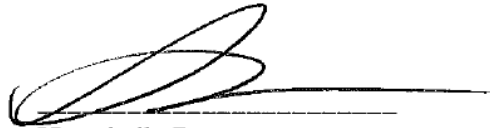
13. If I had known at the time about Ms. Farak's misconduct, I would not have pled guilty to drug possession in 2008. But I was not told about Ms. Farak's misconduct in 2008.

14. I also understand a Superior Court has found that, in 2013, state prosecutors incorrectly claimed that Ms. Farak's misconduct did not begin until 2012. If I had been told about Ms. Farak's misconduct in 2013, and if I had been told at that time that she was committing misconduct when she worked on my case in 2008, then I would have tried to vacate my conviction in 2013.

15. But I did not find out that Ms. Farak worked on my case until in September 2017, when defense attorneys provided that information to me.

16. To my knowledge, no prosecutor or other state or county employee has ever told me that I am a "Farak Defendant," or that misconduct was committed in my case.

Signed under the pains and penalties of perjury this 17th day of September, 2017.

A handwritten signature in black ink, appearing to read "Herschelle Reaves", written over a horizontal line.

Herschelle Reaves

