

COMMONWEALTH OF MASSACHUSETTS
THE TRIAL COURT

WESSEX, ss

JUVENILE COURT DEPARTMENT
FORDHAM DIVISION
Docket No.

IN RE:

[REDACTED]

Affidavit of Mother

I, [REDACTED], being duly sworn, do hereby state that the following is true to the best of my knowledge and belief:

1. [REDACTED] mother of [REDACTED], the child [REDACTED].
2. In October [REDACTED] Fordham Juvenile Court appointed Attorney [REDACTED] to be my attorney in a case DCF [REDACTED] had filed. Attorney [REDACTED] had represented me in another case in [REDACTED] Court that was dismissed.
3. The October 2013 case was filed due to my substance abuse history.
4. From November 2013 to June 2014, I attended [REDACTED] program for my substance abuse. I successfully completed the program and received a certificate of completion. I told this to [REDACTED]. I also told him the name of my counseling program. He didn't contact the program or obtain my records. He didn't contact my counselors.
5. When I asked Attorney [REDACTED] about the [REDACTED] program and my counselors, he [REDACTED] that he had spoken to them but they would not be helpful to my case. When I called them later that afternoon, they told me they had never heard of or spoken to Attorney [REDACTED].

6. After I graduated from the _____ program, I went to a half-way house called _____. I lived there fully for three months. I told Attorney _____ about this and about my social worker _____ three weeks before trial. Attorney _____ didn't call the half-way house or obtain the records.
7. I told Attorney _____ in October 2013 that my sister, _____ wanted to take custody of my children. _____ wanted this to happen. I also gave him my sister's phone number.
8. Attorney _____ never called my sister. I had to call her _____ days before my trial and have her come to _____ . She had never heard a word from Attorney _____ .
9. My sister was convicted of selling heroin in 2005. She served a year at MCI Framingham. She has since attended drug counseling and has been clean, with no criminal record.
10. *[Presumably there is much more that the Mother would say in this case about problems with trial counsel. Whatever appellate counsel or new trial counsel needs to say that only Mother knows about must be in this affidavit.]*

Signed under the penalties of perjury, in Wessex County, this 2nd day of November, 2014.
