

United States District Court
for the
District of Massachusetts

)	Case Number: _____
Plaintiff:)	
Andrea Brooks)	Jury Trial: Yes
v.)	
)	
Defendants:)	
William Albert D'Errico Jr.)	
Lisa D'Errico)	
Karen R. Delaney aka Karen D'Errico)	
Gerald Thomas Delaney)	
Cynthia P. Gilman)	
Alice Spelas Love, NH Court Referee)	
Susan B Carbon, NH Court Referee)	
Lauren Thorn, NH Hearing Officer)	
Mark S. Derby, NH Family Court Judge)	
Julie Introcaso, NH Family Court Judge)	
Michael Ryan, NH Family Court Judge)	
Metropolitan Security Services Inc, dba, Walden Security))	

FILED
 IN CLERKS OFFICE
 2020 NOV 27 PM 1:11
 U.S. DISTRICT COURT
 DISTRICT OF MASS.

Complaint for a Civil Case

I. Parties to This Complaint

A. The Plaintiff

1. Andrea Brooks
96 Old County Road
Winchendon, MA 01475

B. Defendants

2. William D'Errico Jr
13 Mobile Coach Lane
Mont Vernon, NH 03057
3. Lisa D'Errico
13 Mobile Coach Lane
Mont Vernon, NH 03057
4. Karen Delaney aka Karen D'Errico
4 Bridge Street
Bedford, MA 01730
5. Gerald Thomas Delaney
4 Bridge Street
Bedford, MA 01730
6. Cynthia P. Gilman
38 W Brook Street
Manchester, NH 03101
7. Alice Spelas Love
4 Baboosic Lake Road

Merrimack, NH 03054

8. Susan B Carbon

4 Baboosic Lake Road

Merrimack, NH 03054

9. Lauren Thorn

4 Baboosic Lake Road

Merrimack, NH 03054

10. Mark S. Derby

4 Baboosic Lake Road

Merrimack, NH 03054

11. Julie Introcaso

4 Baboosic Lake Road

Merrimack, NH 03054

12. Michael Ryan

4 Baboosic Lake Road

Merrimack, NH 03054

13. Metropolitan Security Services Inc, dba, Walden Security

100 East Tenth Street Suite 400

Chattanooga, TN 37402

II. Basis for Jurisdiction

The basis for federal court jurisdiction is **28 U.S.C. § 1331** Federal question. *The district courts shall have original jurisdiction of all civil actions arising under the Constitution, laws, or treaties of the United States.*

- a. Thirteenth Amendment
- b. Fourteenth Amendment
- c. Victims of Trafficking and Violence Protection Act of 2000
- d. Abolish Human Trafficking Act of 2017
- e. The Mann Act of 1910
- f. 18 U.S.C. § 241 Civil Rights - Criminal Conspiracy to Violate Civil Rights
- g. 18 U.S.C. § 242 Civil Rights - Criminal Civil Rights Violations
- h. 18 U.S.C. § 1509 Obstruction of Justice - Obstruction of Court Orders
- i. 18 U.S.C. § 1589 Peonage, Slavery, and Trafficking in Persons - Forced Labor
- j. 18 U.S.C. § 1590 Peonage, Slavery, and Trafficking in Persons - Trafficking with Respect to Peonage, Slavery, Involuntary Servitude, or Forced Labor
- k. 18 U.S.C. § 1593 Peonage, Slavery, and Trafficking in Persons - Mandatory Restitution
- l. 18 U.S.C. § 1593A Peonage, Slavery, and Trafficking in Persons - Benefitting Financially from Peonage, Slavery, and Trafficking in Persons
- m. 18 U.S.C. § 1594 Peonage, Slavery, and Trafficking in Persons - General Provisions
- n. 18 U.S.C. § 1595 Peonage, Slavery, and Trafficking in Persons - Civil Remedy
- o. 18 U.S.C. § 1595A Peonage, Slavery, and Trafficking in Persons - Civil Injunctions
- p. 18 U.S.C. § 2261 Domestic Violence and Stalking - Interstate Domestic Violence
- q. 18 U.S.C. § 2261A Domestic Violence and Stalking - Stalking
- r. 18 U.S.C. § 2264 Domestic Violence and Stalking - Restitution
- s. 18 U.S.C. § 2265 Domestic Violence and Stalking - Full Faith and Credit Given to Protection Orders
- t. 18 U.S.C. § 2421 Transportation for Illegal Sexual Activity and Related Crimes - Transportation Generally
- u. 18 U.S.C. § 2421A Transportation for Illegal Sexual Activity and Related Crimes - Promotion or Facilitation of Prostitution and Reckless Disregard of Sex Trafficking

- v. 18 U.S.C. § 2422 Transportation for Illegal Sexual Activity and Related Crimes - Coercion and Enticement
- w. 18 U.S.C. § 2428 Transportation for Illegal Sexual Activity and Related Crimes - Forfeitures
- x. 28 U.S.C. § 1441 District Courts, Removal of Cases From State Courts - Removal of Civil Actions
- y. 28 U.S.C. § 1449 District Courts, Removal of Cases From State Courts - State Court Record Supplied
- z. 42 U.S.C. § 1981 Civil Rights - Equal Rights Under the Law
- aa. 42 U.S.C. § 1983 Civil Rights - Civil Action for Deprivation of Rights
- bb. 42 U.S.C. § 1985 Civil Rights - Conspiracy to Interfere with Civil Rights
- cc. 42 U.S.C. § 1986 Civil Rights - Action for Neglect to Prevent

The Amount in Controversy:

The amount in controversy is more than the minimum required, not including interest and costs of the court, because the violation of the plaintiff's rights by the defendants was so egregious as to warrant compensatory damages in the amount of \$13,000,000 and punitive damages in the amount of \$13,000,000. The total amount of damages, sought by the plaintiff, is twenty-six million dollars.

III. Statement of Claim

- 14. My name is Andrea Brooks and I am the Plaintiff in this case. I am a black hispanic woman. Everyone else involved in this case is white. I was wronged by all of the defendants named in this case and I believe I should be compensated for the harm I have suffered. I decided to file a civil suit in United States District Court because I was treated unfairly in New Hampshire Family Court and this case involves violations of Federal Law.
- 15. I am a Pro Se plaintiff despite my attempts to find legal assistance. I do not have a lawyer because I cannot afford to pay an attorney. I tried to find an attorney and the attorney I met only helped me when I had sex with him in exchange for legal

services. I do not want that kind of help. I am really tired of being abused and exploited. I can only afford to accept pro bono legal services.

16. I reached out to LARC (Legal Advice and Resource Center) for legal assistance in New Hampshire and a LARC employee told me he could not help me because I am having an issue with the very people who fund the agency that employs him. The LARC employee told me that my situation was not unique and he had witnessed a pattern of judicial misconduct by certain judges in New Hampshire Family Court. The LARC employee encouraged me to pursue this case on my own if I could not find a private attorney. I worked really hard on this petition despite the fact that I have no formal legal training. I am pleading with this Court to respect my PRO SE rights. I am willing to fight this case by myself if the Court is unable to help me find pro bono legal services.
17. I am a victim of human trafficking, specifically sex trafficking. I started working as a sex worker through online ads in 2013 and William D'Errico Jr, the father of my son, demanded that I give him money from the proceeds of my sex work. I did give him some of the money I made from prostitution but he always wanted more. William D'Errico Jr is the father of my youngest son. In 2013 I lost my housing subsidy, I became homeless, and I had no way to support myself. Out of desperation I chose to perform commercial sex acts to support myself. I started working as an escort (prostitute) in 2013 because I had no savings, I had no job, and then I had nowhere to live. I used backpage.com to post escort ads. Backpage.com was a well-known website that was shut down in 2018 because of human trafficking. William D'Errico knew about my escort ads. William D'Errico stalked me online in an effort to find out when I was "working" because he wanted me to give him the money I made from sex work. I gave him some of the money. He wanted more. William D'Errico Jr has a history of being abusive toward me. I had an Order of Protection in 2011 out of Massachusetts. There is currently an Order of Protection that was issued in Massachusetts 2019 and extended again in 2020.
18. While I was pregnant Lisa D'Errico asked if I would let her adopt my baby. When I declined Lisa D'Errico started harassing me. Lisa D'Errico told me to meet her at the Pheasant Lane Mall in Nashua, NH when I was pregnant because she wanted to beat

me up. William D'Errico had to calm his wife down. Lisa D'Errico was so angry that I would not agree to let her adopt my baby that she threatened to assault me while I was pregnant

19. Lisa D'Errico introduced me to her husband in 2009 because she wanted to exploit me sexually. Lisa D'Errico wanted her husband to get me pregnant because she believed she could convince me to let her adopt my baby. Lisa D'Errico thought I would be willing to give my baby away because I already had four children. That is a ridiculous notion. When Lisa D'Errico failed at convincing me to let her adopt my baby, she harassed me and threatened me with physical violence.
20. Lisa D'Errico had a fertility issue so she was unable to have a baby. She desperately wanted a baby and she was willing to break the law to achieve that goal. William D'Errico and Lisa D'Errico conspired to solve their fertility issues by targeting a young woman that they could impregnate then take the baby. William D'Errico is an aggressive and violent man. On multiple occasions William D'Errico verbally and physically assaulted me. William D'Errico was enraged that he did not have custody of our son. He expected me to give birth and immediately hand my baby over to him.
21. In 2009 Lisa D'Errico picked me up in Massachusetts and took me to the home she shares with her husband, William D'Errico, in New Hampshire. When this was happening I did not realize that Lisa D'Errico and William D'Errico intended to exploit me. Lisa D'Errico picked me up in Massachusetts and drove me to her house in New Hampshire because she wanted to reward her husband, William D'Errico, for being kind to her while she was recovering after a motorcycle crash. Lisa D'Errico broke her leg in a motorcycle crash and William D'Errico was nice to her so Lisa D'Errico wanted to reward him with deviant group sex. Lisa D'Errico eventually told me that she was looking for a woman who would be a human sex toy for her husband and for herself on an ongoing basis. I told her I was not interested in being in that role.
22. Lisa D'Errico initiated this case of exploitation. Lisa D'Errico was, and still is, an eager participant in exploiting me. Lisa wanted to use me as a sex toy and take my child away from me because she was unable to give birth to a child herself. I got pregnant after having sex with William D'Errico when I was intoxicated. William

D'Errico and Lisa D'Errico targeted me because I already had four children. They thought I would be willing to give away my fifth child because I already had four children. When that proved untrue they started abusing the court system in an effort to deprive me of my rights.

23. At the end of 2012 I was attacked by the father of my other children. He is not involved in this case. The attack led to me being hospitalized. My son had to spend more time with William D'Errico Jr after I was attacked. William D'Errico Jr requested custody again in Massachusetts Family Court in 2012/2013 and I did not object because I needed his help.
24. Massachusetts Family Court granted William D'Errico's request for custody in 2013 because I did not object to his request. Massachusetts Family Court included wording about parenting time for Mother (me, Andrea Brooks). The Order from Massachusetts Family Court said "Visitation shall be as agreed upon by the parties." Massachusetts Family Court did not terminate my parental rights. William D'Errico and I were able to agree on a co-parenting schedule until 2015.
25. In 2015 William D'Errico invited my daughter to sleep over his house. My daughter was twelve years old at the time and she is not related to William D'Errico. I declined the invitation and William D'Errico insisted that my twelve year old daughter sleep over his house. He even tried to coerce my daughter into agreeing to the sleepover but my daughter did not want to stay at his house. William D'Errico was angry that I would not let him have my daughter overnight. I did not let her go because I know William D'Errico is a pedophile. William D'Errico is sexually attracted to children, specifically pubescent girls. I protected my daughter from a potentially dangerous situation and William D'Errico retaliated against me.
26. Immediately following my refusal to allow my twelve year old daughter to sleep over William D'Errico's house, he stopped letting me see my son in retaliation. I did not relent. I never allowed him to have my daughter sleepover his house and I have no regrets about that.
27. William D'Errico is sexually attracted to pubescent girls. In 2009 when I met him, William D'Errico repeatedly and openly expressed an inappropriate interest in his minor niece who lived in Florida. William D'Errico described in detail how beautiful

his niece was and he was open about how he enjoyed “teasing” her until she cried. William D’Errico said his niece was about thirteen years old at that time but I never met her. Another thing that happened in 2010 confirmed my suspicion that William D’Errico is a pedophile. While visiting our son at my home in Newton, MA in 2010 William D’Errico made a crude comment about a girl that walked by. He said “Look at the ass on her!” and I said “Look at her face. She’s only like twelve years old.” Then he said “Ya, twelve-teen.” And he laughed. I was disgusted. William D’Errico is sexually attracted to pubescent girls, children.

28. I want to contrast the way this case was handled in Massachusetts Family Court [Docket Number 10W1723](#) compared to how the same case was handled in New Hampshire Family Court [Docket Number 656-2016-DM-00107](#), [Docket Number 657-2017-TR-00009](#) and [Docket Number 657-2016-DM-291](#). Judge Gibson from Massachusetts Family Court was fair and she always issued orders promptly. I was not happy with all of Judge Gibson’s decisions but I always felt that Judge Gibson was being fair and just based on the information presented. Based on my experience with Judge Gibson in Massachusetts Family Court I assumed that I would be treated fairly in New Hampshire Family Court as well. That proved untrue. I was treated unfairly in New Hampshire Family Court from the start. If this case had remained in Massachusetts Family Court I might not have had my rights violated in this way. New Hampshire Family Court violated my rights and encouraged William D’Errico and his co conspirators to violate my rights as well.
29. William D’Errico and Lisa D’Errico made numerous false allegations about my parenting in an attempt to win custody of my son in Massachusetts Family Court. Because the accusations were unfounded custody did not change. Massachusetts Family Court did not terminate my parental rights.
30. William D’Errico’s decision to keep my son away from me was a direct violation of the Court Order out of Massachusetts Family Court. I could not go back to Court in Massachusetts because my son had been living outside of Massachusetts for six months. I had to go to New Hampshire Family Court instead because they had jurisdiction.

31. On January 28, 2016 I sought relief in New Hampshire Family Court **Docket # 656-2016-DM-00107**. I could not afford the \$252 filing fee to open a case in New Hampshire Family Court. I had ALWAYS qualified for financial assistance in Massachusetts Family Court so I applied for financial assistance in New Hampshire. Judicial Officer Susan B Carbon DENIED my Motion to Waive Filing Fees. Susan B Carbon is NOT a Judge yet New Hampshire Family Court gave her the authority to deny my motion and dismiss my case. The request for financial assistance was denied on February 3, 2016 and the case was dismissed on April 4, 2016. I could not afford to pay \$252 so justice was denied in New Hampshire Family Court. The decision to deny my Motion to Waive filing fees was arbitrary and unfair. In 2019 I filed another Motion to Waive Filing Fees and it was granted. My financial situation had not changed between 2016 and 2019. New Hampshire Family Court's decision making process is unlawful because the Court's decisions are made arbitrarily and inconsistently. Without financial assistance I was unable to move forward with the case in 2016. I was denied justice in New Hampshire Family Court in 2016.
32. August 25, 2016 William D'Errico registered the Massachusetts Family Court Order in New Hampshire to make it a New Hampshire Family Court Case **Docket Number 657-2016-DM-291**
33. February 6, 2017 I filed a Petition to Change Court Order in NH Family Court. In retaliation Lisa D'Errico and William D'Errico filed a Petition to Terminate my parental rights **Docket Number 657-2017-TR-00009**. William D'Errico was in direct violation of the Order out of Massachusetts Family Court by not letting me see my son. Because I went to Court to fight that injustice, his disgusting wife, Lisa D'Errico, filled out the paperwork to try to steal my son from me by having my parental rights terminated. My parental rights were NOT terminated by Massachusetts Family Court. There is no reason why my parental rights should be terminated. Lisa D'Errico is jealous and hateful. She and William D'Errico both exhibited a callous disregard for my son's well being. My son has a right to have a relationship with me. I have always had an incredibly strong bond with my son despite Lisa D'Errico's many attempts to take my place. It is disgusting that people would do that to a child. They later withdrew the Petition for Termination.

34. In 2017 Karen Delaney aka Karen D'Errico and Gerald Delaney, William D'Errico Jr's mother and step-father, conspired with William D'Errico Jr and Lisa D'Errico to deprive me of my rights. They wanted to violate my parental rights and force me into sexual slavery for William D'Errico Jr's benefit.
35. New Hampshire Family Court has never treated me fairly. Michael Ryan was the first judge out of New Hampshire to violate my rights in 2017. At that point Michael Ryan only knew that I was a perceived black person from Massachusetts and the opposing party was a white man from New Hampshire. Michael Ryan is a white man. Michael Ryan refused to listen to anything I had to say. Michael Ryan cancelled my hearing and did not issue orders.
36. An employee at LARC told me that although it is illegal, there are a few New Hampshire Family Court judges who don't issue orders in some cases if they don't want to. The level of corruption and incompetence in the New Hampshire Family Court is criminal. New Hampshire Family Court violates the Constitutional Rights of parents in their jurisdiction.
37. Michael Ryan violated my right to due process under the Fourteenth Amendment. I sought relief in Federal Court in 2017 [Docket Number 17CV40049TSH](#). When I filed the petition in Federal Court in 2017 I was unfamiliar with the process and I failed to respond to a motion to dismiss so the case was dismissed without prejudice. I will NOT make that foolish mistake again. I will Respond promptly to every motion filed in this case.
38. Alice Love is not a judge. Julie Introcaso who is a judge had to sign off on the recommendations made by Alice Love after Michael Ryan recused himself from the case. In an effort to retaliate against me for filing a petition in Federal Court, Alice Love recommended unlawful orders. Instead of following the law, Julie Introcaso signed unlawful Orders that deprived me of my parental rights and compelled me to commit commercial sex acts for William D'Errico's benefit. I never met Judge Introcaso but she unfortunately signed the unlawful orders that Alice Love and Lauren Thorn recommended.
39. Lauren Thorn did not follow New Hampshire's child support guidelines. Lauren Thorn recommended that I pay an exorbitant amount of child support based on a

“reasonable estimate” of my income from sex work. That is human trafficking which is illegal.

40. I was hoping that this was just an oversight. I thought New Hampshire Family Court must not have realized that Cynthia P. Gilman was helping William D’Errico and Lisa D’Errico traffic me by abusing the legal process. I thought I would be able to fix this mess by bringing the facts to New Hampshire Family Court’s attention. I presented ALL of the information clearly in open Court on August 8, 2019. New Hampshire Family Court proved that they are cognizant participants in trafficking me. Alice Love adamantly refused to change the unlawful child support order after I pointed out in open court on August 8, 2019 that the child support order amounted to court ordered human trafficking. Julie Introcaso was removed from my case with NO NOTICE after the August 8, 2019 hearing. When Michael Ryan recused himself I was notified and an explanation was given. Julie Introcaso was replaced with no notice.
41. I need to have my case removed to Federal Court because of the egregious violations of both state and Federal laws in New Hampshire Family Court.
42. William D’Errico and Lisa D’Errico conspired to violate the Thirteenth Amendment to the United States Constitution by depriving me of the right to not be enslaved. William D’Errico and his wife Lisa D’Errico abused the legal process in New Hampshire Family Court to deprive me of my rights and force me into sexual slavery. William D’Errico and Lisa D’Errico also violated a New Hampshire Law that was modeled after the Thirteenth Amendment.
 - a) **Thirteenth Amendment to the United States Constitution**
Neither slavery nor involuntary servitude, except as a punishment for crime whereof the party shall have been duly convicted, shall exist within the United States, or any place subject to their jurisdiction.
 - b) **New Hampshire RSA 633:7**
I. (a) It is a class A felony to knowingly compel a person against his or her will to perform a service or labor, including a commercial sex act or a sexually-explicit performance, for the

benefit of another, where the compulsion is accomplished by any of the following means:

(3) Abusing or threatening abuse of law or legal process.

(6) False promise relating to the terms and conditions of employment, education, marriage, or financial support.

(9) Engaging in any scheme, plan, or pattern, whether overt or subtle, intended to cause the person to believe that, if he or she did not perform such labor, services, commercial sex acts, or sexually explicit performances, that such person or any person would suffer serious harm or physical restraint.

(11) Coercing a person to engage in any of the foregoing acts by requiring such in satisfaction of a debt owed to the actor.

(c) A person performs a service or labor against his or her will if the person is coerced into performing the service or labor, or if the person willingly begins to perform the service or labor but later attempts to withdraw from performance and is compelled to continue performing. The payment of a wage or salary shall not be determinative on the question of whether or not a person was compelled to perform a service or labor against his or her will.

43. Lauren Thorn and Julie Introcaso of New Hampshire Family Court signed an unlawful child support order on August 14, 2017 based on a “reasonable estimate” of my income. The Order is unlawful because Alice Love and Julie Introcaso of New Hampshire Family Court stated the following in the previous Order dated June 1, 2017:

- a) “...mother denied that she is in the escort business now”
- b) “Additionally, mother also lives in S. Portland Maine and there is some evidence that she was operating as an ‘escort’ in this location... She has testified that she is no longer in this business.”
- c) “She is not to ‘work’ during any of her parenting time.”

44. New Hampshire Family Court noted that there was evidence that I was working as an escort in Maine. Escort is a euphemism for prostitute. The Court Ordered me not to

“work” during my parenting time which implies that I was supposed to “work” when my son was not with me. Work was put in quotes to imply that the work was nefarious.

45. The fact that the two orders were issued in close succession is further proof that New Hampshire Family Court made a blatant attempt to traffick me. They already had evidence that I was a sex worker. There was no evidence of any other source of income because sex work was my only source of income until December 2017 when I started collecting disability income for indigent people in Massachusetts (EAEDC).
46. The child support order dated August 14, 2017 was ordered upon default. I failed to appear so the Court used a “reasonable estimate” of my income to determine the amount I would have to pay. I thought they would run my social security number and base the child support on income that could be proven. I never expected New Hampshire Family Court to base a child support order on income from sex work. That is human trafficking.
47. Alice Love, Lauren Thorn, and Julie Introcaso of New Hampshire Family Court compelled me to perform commercial sex acts and give the money to William D’Errico. Cynthia Gilman, Lisa D’Errico, and William D’Errico provided the evidence of me being a sex worker. Gerald Delaney and Karen Delaney conspired with William D’Errico Jr and Lisa D’Errico to deprive me of my rights and force me into sexual slavery. Gerald and Karen helped William and Lisa pay their attorney, Cynthia Gilman. Cynthia Gilman provided evidence to New Hampshire Family Court that I was working as a prostitute. The Court Order dated June 1, 2017 states that there is evidence that I was working as an escort (prostitute) in Maine in 2017. This is a well-documented case of human trafficking. This is a case of sex trafficking and I am the victim. This is an ongoing situation and I need help.
48. Gerald Delaney and Karen Delaney were willing conspirators in intentionally inflicting emotional distress on my son and me. The reason my son was in court on September 5, 2019 is because my son was distraught over the fact that his father kept him away from me for several months in violation of the Court Order. My son feels like he has been kidnapped. He misses his mom and his maternal family members. My son has to beg his father not to violate Court Orders because my son values the

time he spends with me. William D'Errico has repeatedly violated New Hampshire Family Court Orders with impunity. New Hampshire Family Court refuses to hold William D'Errico accountable for his blatant insubordination. New Hampshire Family Court is biased against me and my son is suffering under this injustice.

49. When I was in Court I tried to deny that I was a sex worker in a feeble attempt to save my reputation. I don't care about my reputation anymore. I am not going to let these people shame me into perpetual silence. I am tired of being exploited, abused, and enslaved. I need help to escape this terrible situation.
50. William D'Errico and Lisa D'Errico started coercing me to commit commercial sex acts for their benefit in 2013. William D'Errico and Lisa D'Errico used several coercive tactics to compel me to give them money that I earned as a sex worker. In 2013 William D'Errico told me that he needed \$400 for a new wood stove to heat his home and he could not afford it. He said he needed help keeping his house warm for our son. In 2013 I was compelled to give William D'Errico \$400 from money I made working as an escort. William D'Errico knew that the money came from commercial sex acts because I was unemployed and homeless at that time. William D'Errico told me that without a new wood stove our young son would be cold at William D'Errico's house. William D'Errico did not buy a new wood stove with the money I gave him. William D'Errico lied about needing a new wood stove in 2013 so he could collect more money from me. William D'Errico knew the money came from sex work and he did not care. He took the money and he demanded even more.
51. There were several other instances in 2013, 2014, and 2015 when William D'Errico and his wife Lisa D'Errico collected proceeds of commercial sex acts from me. Some of the cash was stored in a five gallon water container and eventually William D'Errico and Lisa D'Errico used the money to help pay for a vacation to Florida. When William D'Errico could no longer convince me to give him money he decided to abuse the legal process to force me to work as an escort and give the money to him.
52. New Hampshire Family Court stated that there was evidence that I was working as an escort in Maine in 2017. Just because I was already a prostitute doesn't mean anyone has the right to collect the money or compel me to continue doing sex work to pay child support. Cynthia P. Gilman conspired with her clients to traffick me through the

- New Hampshire Family Court. Alice confirmed that NH Family Court had knowledge and evidence of me being a sex worker and Alice Love compelled me to perform more sex acts and give the money to William D'Errico. Alice Love abused the legal process to enslave me. Judge Julie Introcaso signed the unlawful orders.
53. Lauren Thorn claimed to use a reasonable estimate of my income after Alice Love determined that I was a sex worker. Lauren Thorn recommended an unlawful order and Judge Introcaso signed the order.
- a) **United States v. Collier, 932 F.3d 1067 (8th Cir. 2019)** *The Eighth Circuit stated, per Federal Rule of Evidence 412 and the Eighth Circuit's own prior holding in United States v. Roy, evidence of a victim's participation in prostitution either before or after the time period in the indictment has no relevance to whether the defendant was forced, coerced, or defrauded her into committing commercial sex. The Eighth Circuit relied on its prior holding in the United States v. Paul, 885 F.3d 1099, 1101 (8th Cir. 2018). In that case, the Eighth Circuit joined seven other circuits in finding a § 1591 sex trafficking conviction does not require a completed commercial sex act.*
54. The amount of child support that New Hampshire Family Court ordered me to pay based on their estimate of my income was so high that I am unable to get my passport and my drivers license was suspended. I was arrested in 2020 for driving on a suspended license. New Hampshire Family Court ordered me to pay \$1,000 in arrears and \$125 per week. They later had to lower the amount to \$50 per month because my actual income was so extremely low. New Hampshire Family Court's estimate of my income was unreasonable and it was unlawful for them to make me give money from prostitution to anyone else. At this point they say I owe about \$4,000. I cannot afford that.
55. The Equal Protection Clause of the Fourteenth Amendment affirms that fathers and mothers have equal rights to parent their child. New Hampshire Family Court repeatedly violated the Equal Protection Clause in the case of Andrea Brooks v.

William D'Errico **Docket Number 657-2016-DM-291**. New Hampshire Family Court exhibited preferential treatment **for** the white, New Hampshire resident (William D'Errico) **over** the black Massachusetts resident (Andrea Brooks). I submitted several Parenting Plans that were ignored in favor of William D'Errico's Parenting Plans. The bias exhibited by New Hampshire Family Court was so blatant that it would be easy to see if the file was reviewed.

56. The Mann Act of 1910 and its subsequent amendment resolutions makes it a felony to knowingly persuade, induce, or coerce an individual to travel across state lines to engage in prostitution or attempts to do so. This is a Federal Law that criminalizes the transportation of "*any woman or girl for the purpose of prostitution or debauchery, or for any other immoral purpose.*" New Hampshire Family Court had evidence that I was working as an escort in Maine. I live in Massachusetts. New Hampshire Family Court compelled me to cross state lines to engage in prostitution so I could give the money to William D'Errico.
57. Metropolitan Security Services Inc., doing business as Walden Security is the security company for the courthouse in Merrimack, New Hampshire. On September 5, 2019 Walden Security failed to protect me and my son from William D'Errico Jr. William D'Errico assaulted my son and me in the courthouse on September 5, 2019. I contacted the head of security Jason Jordanhazy for a copy of the video recording of the incident that took place in the courthouse and he ignored me.
58. Walden Security is guilty of both Negligent Infliction of Emotional Distress and Intentional Infliction of Emotional Distress. Walden Security tried to silence me on several occasions during hearings when I have the right to represent myself. On a few occasions an older male employee of Walden Security stood over me menacingly while I was trying to plead my case. I had done nothing wrong. I am not a large person. I am 5'5" tall and I weigh about 120lbs. The security worker treated me like I was a major threat but he did not treat William D'Errico that way. The security officer did not treat Cynthia Gilman that way. The white security officer chose to treat the only nonwhite person like a criminal. I should have been protected from William D'Errico Jr and instead I was treated like I was the threat. Walden Security violated

my First Amendment right to speak. The security officer repeatedly tried to silence me during hearings.

59. Walden Security is guilty of Negligent Failure to Protect. All of the security workers were downstairs on the first floor when William D'Errico was assaulting my son and me on the second floor. A security worker should have been present on the second floor while people were there.
60. Maryann Dempsey, general counsel for New Hampshire Family Court, contacted me via email to inform me that she had the video recordings but she refused to provide me with the copies.
61. I also requested a copy of the video and audio recordings from the hearing on August 8, 2019 and that was also withheld from me too. New Hampshire Family Court withheld evidence of wrongdoing by the Court and by their security. Instead of giving me the copies I requested, they referred the situation to their General Counsel, Maryann Dempsey. That is at the very least shady if not illegal.

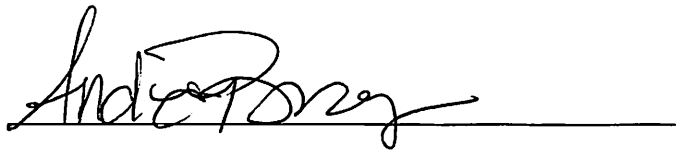
IV. Relief

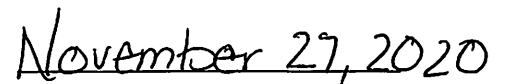
- A. Damages Totaling \$26,000,000
 - a) All Defendants shall be individually and severally liable for damages
- B. Protection Order to protect Plaintiff, Andrea Brooks, from all of the named defendants in this case.
- C. Declaratory Decree
 - a) Temporary Custody of my son W.A.D. dob July 20, 2010
 - b) Vacate Unlawful Child Support Order

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint:

- (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation;
- (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law;
- (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and
- (4) the complaint otherwise complies with the requirements of Rule 11.

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

A handwritten date in black ink, "November 27, 2020", written over a horizontal line.