

**AFFIDAVIT OF ONNADAY MCINTOSH-GRIGGS**

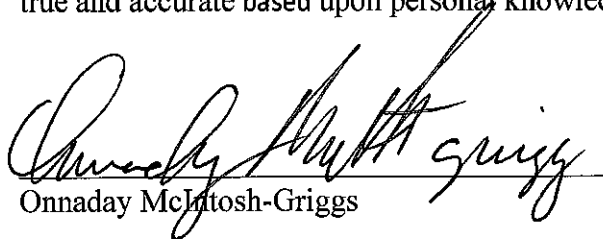
I, Onnaday McIntosh-Griggs, being of sound mind and over the age of 18, hereby swear and affirm as follows:

- 1) I am an adult female resident of Gilmor Homes. I am employed full-time as a Certified Nursing Assistant providing one-on-one care for the elderly.
- 2) In 2014, I spoke to Mr. Coleman, asking him when he was going to perform repairs in my home. Mr. Coleman responded, when are you going to let me come see you at your house?" I refused his advances and the repairs were not done.
- 3) On another occasion, I lost electrical power in my home. Mr. Coleman responded to her call for service. Mr. Coleman looked at me suggestively and said, "it looks nice in here; it looks good in here; you want to go upstairs?" Again, I refused his advances.
- 4) On another occasion, I went to the rental office to ask about repairs needed to my floors. Mr. Coleman responded, "I can wax your floors, I'll give you some wax alright." Again, I refused his advances.
- 5) On yet another occasion when I was in the rental office, Mr. Coleman came up behind me and rubbed his erect penis on my buttocks. I made it clear that this was unwelcome.
- 6) As a result of my rejection of these advances, Mr. Coleman has refused to properly follow up on my requests for services, allowing dangerous conditions to fester in my home unabated.
- 7) The deplorable conditions in my home include peeling paint, a rat infestation, a hole in kitchen with water leaking from the upstairs toilet which prevents me from cooking in the kitchen, tile falling off of the shower walls when I use them, a toilet which is not secured to floor, the heater leaking water in the kitchen (which maintenance just turned off instead of fixing, so I now have no heat in the kitchen with the winter coming), no heat in a second of my 5

rooms, windows that do not open, gaps around the windows allowing cold air to come in and a broken refrigerator.

8) I am coming forward now, with counsel, to put a stop to this behavior and to help other women at Gilmer.

I swear and affirm, under penalty of perjury, that the facts in the forgoing affidavit are true and accurate based upon personal knowledge.

  
Onnaday McIntosh-Griggs

**AFFIDAVIT OF NICOLE ANDREA SMITH**

I, Nicole Andrea Smith, being of sound mind and over the age of 18, hereby swear and affirm as follows:

- 1) I am a 33 year-old female resident of Gilmor Homes, a public housing project in Baltimore, Maryland.
- 2) I am a gainfully employed single mother. My daughter is 8 years old.
- 3) I first came to Gilmor as a young single woman in my 20's in 2008. I was fleeing with my one-year old daughter from an abusive relationship which culminated in my child's father breaking into my home and attempting to kill me. Prior to that, I had never lived in public housing.
- 4) Despite working full time, I am unable to afford to leave Gilmor because my finances were left in shambles as a result of the abusive relationship I had just escaped.
- 5) Shortly after I first arrived, the head of maintenance, a public employee I know as Mr. Coleman, came to my home to do an "inspection." Mr. Coleman is employed by the Housing Authority of Baltimore City and the Department of Housing and Community Development.
- 6) After the "inspection," Mr. Coleman told me that I could get "extra stuff" if I needed it.
- 7) I asked Mr. Coleman what he meant and he responded that he would fix any problems in the apartment if I came to see him in his office where we could "talk about it." He looked at me suggestively when he said this, but I did not fully understand what he meant.
- 8) The next day, I went to Mr. Coleman's office expecting to discuss the procedures for having repairs made.
- 9) Mr. Coleman asked me to come in and close the door. It was just the two of us in the office. I said, "what do I have to do to get things fixed?" I expected him to explain the work order procedure to me. He was seated and pushed himself back from his desk, exposed himself to me and said "what can you do with this?"
- 10) I was shocked, young, scared, fleeing an abusive relationship and worried about the health and safety of my daughter. I felt I had no choice but to give in to Mr. Coleman's demands, so I did as he had asked and performed oral sex on him.
- 11) Afterward, I left his office.

- 12) I was scared and ashamed, and I tried to forget about the incident and avoid Mr. Coleman.
- 13) As problems arose with my unit, I followed procedure and put in requests for repairs called "work orders." Initially, all of my work orders were timely addressed. I noticed that other women were not getting the level of service I received.
- 14) As time went by, Mr. Coleman began to ignore my requests for repairs.
- 15) Although I tried to avoid him, when I did see Mr. Coleman, he frequently demanded intercourse or oral sex from me. This has continued throughout my time at Gilmor up to the present.
- 16) Repairs in my unit went undone for long periods of time.
- 17) I became more and more afraid of Mr. Coleman during this period. Mr. Coleman controls a large group of male maintenance workers, some of whom also engage in this behavior.
- 18) Frequently, maintenance workers would make sexual comments about my body, commenting, for instance, about my buttocks. This has continued throughout my time at Gilmor up to the present.
- 19) I could no longer avoid Mr. Coleman when I had a gas leak behind my stove. I could smell the gas and I was in fear for my life and the life of my daughter.
- 20) I went to Mr. Coleman's office to request that the gas leak be fixed. He said that he couldn't smell the leak from his office across the street, but that he would come by after hours.
- 21) Mr. Coleman came to my house that evening around 10:00 p.m. I opened the door and he immediately entered and, without saying anything, he put his hands on me and proceeded to have sex with me in the front room.
- 22) I did not encourage him in any way physically or verbally. I wanted it to end as quickly as possible. I thought about my safety and the safety of my daughter to get through it.
- 23) When Mr. Coleman was finished, he left.
- 24) The next day, workmen arrived to fix the gas leak and it was fixed.
- 25) After that, Mr. Coleman began to ignore my work orders again.
- 26) Among other problems, an earthquake caused a portion of one of my walls to begin to cave in.

- 27) At one point, my front door did not close properly. I was afraid for my safety because the door wouldn't latch properly and someone could have easily broken in given that the door was broken.
- 28) Gilmore is located in an extremely high crime area. I was so scared that at night that I piled heavy objects like my tool box against the door. This made me worry that my daughter and I might get trapped inside in the event of a fire.
- 29) At another point, there was insufficient heat in the house.
- 30) I put in work orders whenever problems arose, but they were ignored.
- 31) My next door neighbor warned me that if I didn't continue to give in to Mr. Coleman, that, in addition to allowing my unit to go unrepaired, he would send other women to physically assault me in order to get him to do their repairs. I believe that Mr. Coleman told her to pass this threat along to me.
- 32) After I received Mr. Coleman's threat through my neighbor, I was petrified.
- 33) Mr. Coleman exercises significant control over the community. In addition to withholding repairs and making physical threats, his crews can make complaints that may result in residents losing their homes. I have no place else to go and my daughter and I would be homeless if this happened.
- 34) For all of these reasons, but primarily in an effort to protect my daughter and out of fear, I gave in to Mr. Coleman's demands for sexual intercourse a total of four times and oral sex once, both in his office and at my home. At least three of these events occurred within the last three years.
- 35) After each time I gave in, Mr. Coleman had long-overdue work done to my unit.
- 36) In late 2013 or early 2014, Mr. Coleman said, "If you help Mike 'get some,' we'll do your work orders." "Mike" was another maintenance technician employed by the Housing Authority of Baltimore City and the Department of Housing and Community Development. "Mike" works for Mr. Coleman.
- 37) By this time, the stress of living with what I was being forced to do was overwhelming. I was doing everything possible to avoid Mr. Coleman. I even arranged my work schedule so that I leave before he arrives and get back after he is gone. His office is directly across from my house and he can watch me come and go, so there is ultimately no escaping him. When I see him, he makes suggestive comments and faces which make me feel ill.

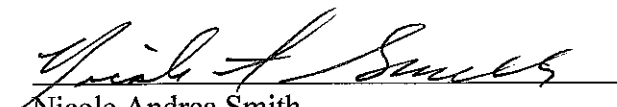
38) I could not stand the thought of this happening with another man. I refused to “help Mike ‘get some.’” As a result, Mr. Coleman has prevented any work from being done to my house.

39) In early 2014, I went to Mr. Coleman’s boss, the property manager, Ms. Scott. I explained to Ms. Scott everything that is included in this affidavit in even greater detail. Ms. Scott listened to everything I had to say and offered no response at all. She just sat there. After a long pause, I said thank you for listening to me and I left. Shortly thereafter, Ms. Scott retired. I never heard back from anyone regarding our discussion.

40) Currently, there are numerous unaddressed health and safety issues in my home including a radiator which leaks and will not provide heat for the coming winter, a bathroom heater that does not work, clogged drains, broken doors, windows and cabinets. All of these items are reflected in work orders that have been pending for months or longer.

41) I am coming forward now, with counsel, to put a stop to this behavior and to help other women at Gilmor.

I swear and affirm, under penalty of perjury, that the facts in the forgoing affidavit are true and accurate based upon personal knowledge.

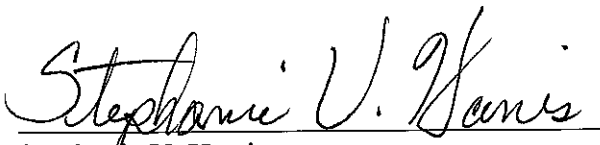
  
Nicole Andrea Smith

**AFFIDAVIT OF STEPHANIE V. HARRIS**

I, Stephanie V. Harris, being of sound mind and over the age of 18, hereby swear and affirm as follows:

- 1) I am a female resident of Gilmore Homes who moved in to the community on February 10, 2014.
- 2) In spring of 2014, I needed repairs, but I refused to provide sexual favors in exchange and the maintenance supervisor, Clinton Coleman told me, "you don't want to get with me, you think you are having problems now, just wait."
- 3) I took this as a threat not to repair my unit if I did not give in to Mr. Coleman's sexual demands.
- 4) Mr. Coleman made good on his threat after I refused to sleep with him. He refused to timely address dangerous conditions in my unit.
- 5) Currently, the following issues are unabated in my unit: the bathtub knob is broken and I must operate my bathtub with pliers, there is a roach infestation, there are rodents and rodent feces in my cabinets, there are sockets dangling from the walls by their wires, my windows are not the correct size for their frames leaving air gaps, my windows will not lock and I have had 3 microwaves and a video camera stolen as a result.
- 6) I am coming forward now, with counsel, to put a stop to this behavior and to help other women at Gilmore.

I swear and affirm, under penalty of perjury, that the facts in the forgoing affidavit are true and accurate based upon personal knowledge.

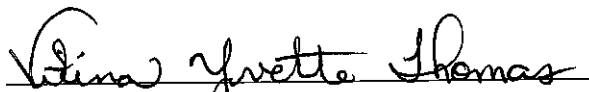
  
Stephanie V. Harris

**AFFIDAVIT OF VITINA YVETTE THOMAS**

I, Vitina Yvette Thomas, being of sound mind and over the age of 18, hereby swear and affirm as follows:

- 1) I am a 54-year-old female resident of Gilmore Homes, a public housing project in Baltimore, Maryland. I am disabled and I walk with a cane. I moved in to Gilmore in June of 2014.
- 2) After I moved in, Michael Robertson told me that if I did not "give him some booty," he would not make repairs to my unit.
- 3) Within the last 6 months, Mr. Robertson came to my house after a male visitor had just left. Mr. Robertson said, "I see your boyfriend just left, can I get a turn?" I rejected his advances and he left without doing any of the long-outstanding work in my home.
- 4) Among other issues with my home, I suffer with mold, rats who recently consumed half of a loaf of bread on my counter in one night, and rusty yellow and brown water. In addition, I require accommodations for my disability which have not been provided. These include ramps and handles on the wall in the bathroom to assist me in using the bathtub and the toilet.
- 5) I am coming forward now, with counsel, to put a stop to this behavior and to help other women at Gilmore.

I swear and affirm, under penalty of perjury, that the facts in the forgoing affidavit are true and accurate based upon personal knowledge.

  
Vitina Yvette Thomas



## AFFIDAVIT OF AMY TOWSON

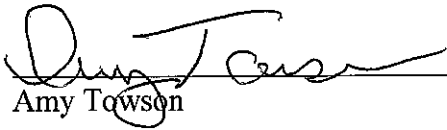
I, Amy Towson, being of sound mind and over the age of 18, hereby swear and affirm as follows:

- 1) I am a 38 year-old female resident of Gilmor Homes, a public housing project in Baltimore, Maryland. I moved in to Gilmor in 2011.
- 2) In the spring of 2012, my unit needed repairs so I contacted the maintenance crew. An employee of the Housing Authority of Baltimore City and the Department of Housing and Community Development named "Mike" came to my home. He asked if he could come back in an hour and a half and I agreed.
- 3) When Mike came back, he said he would pay me "for a date" if I let him "come over" and that he "pays the girls in Gilmor well." Then he grabbed my breast.
- 4) I was shocked and appalled. I had done nothing to encourage this behavior. I told him to stop and asked him to leave.
- 5) I immediately contacted Mike's boss, the property manager, Ms. Emma Scott, to complain. I told Ms. Scott everything that happened. Ms. Scott told me when I call for maintenance, just to request that Mike not come to my house. Ms. Scott took no further action as far as I am aware. After the meeting, I never heard from anyone again in connection with my complaint.
- 6) After this incident, the maintenance crew, including Mike and Mr. Coleman, refused to timely repair problems in my home in retaliation.
- 7) Instead of doing the repairs I need, Mike waits outside just staring at my house for long periods of time. I believe he does this to show that he has time to do the repairs and that he could do them if he wanted to.
- 8) Even now, four years later, there are major problems with my unit.
- 9) Among other issues, my unit has unrepaired leaking pipes. When I run the shower, a puddle forms on the floor from water seeping through the walls. I followed proper procedure and filed a "work order" five months ago to have this repaired and it was ignored.
- 10) The leak has led to mold in all four rooms. The mold is so bad that I have had to throw away furniture and that I sometimes cough up blood. This is unsafe for me and my two-year-old daughter and five-year-old son, who takes asthma medicine and gets frequent bloody noses in the house. I followed proper procedure and filed a "work order" to have this repaired and it was ignored.

11) My windows do not lock and are unsecured in this high crime area. I followed proper procedure and filed a "work order" to have this repaired and it was ignored.

12) I am coming forward now, with counsel, to put a stop to this behavior and to help other women at Gilmore.

I swear and affirm, under penalty of perjury, that the facts in the foregoing affidavit are true and accurate based upon personal knowledge.

  
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Amy Towson

**AFFIDAVIT OF JACQUELINE KIANA MORANT**

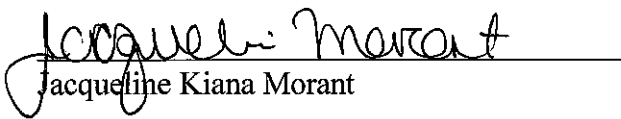
I, Jacqueline Kiana Morant, being of sound mind and over the age of 18, hereby swear and affirm as follows:

- 1) I am a 29 year-old female resident of Westport, a public housing project in Baltimore, Maryland. I moved to Westport in October of 2010.
- 2) In late 2013, an employee of the Housing Authority of Baltimore City and the Department of Housing and Community Development named Mr. Coleman came to my home to replace my blinds.
- 3) I had heard stories of widespread sexual harassment by maintenance workers in Baltimore public housing. Therefore, I used my mobile phone to videotape Mr. Coleman while he was in my home.
- 4) Shortly after Mr. Coleman arrived, a male cousin of mine came over.
- 5) After he had removed the upstairs blinds, Mr. Coleman came downstairs where I was visiting with my cousin.
- 6) Mr. Coleman looked at me and said, "I want you. I just want you." He went on to tell me disgusting stories of him looking up women's nightgowns when he is doing repairs, and women having sex with maintenance men.
- 7) I was shocked and appalled. I had done nothing to encourage this behavior.
- 8) After Mr. Coleman left, I contracted the rental office and spoke to his supervisor to complain. When that complaint went nowhere, I called the Housing Authority of Baltimore City and spoke to Lamont Bivens. I followed up repeatedly with Mr. Bivens, including by sending him a copy of the video tape. Mr. Bivens told me that I was not the first person to complain about Mr. Coleman.
- 9) Mr. Coleman left the community for a short period and then came back. When he came back, every time he saw me, he would give me dirty looks and give me "the finger."
- 10) I never heard back from Mr. Bivens.
- 11) I have observed Mr. Coleman harass other women and young girls. When I saw him soliciting underage girls in our community in the summer of 2015, I contacted Lamont Bivens again. Mr. Bivens took my complaint, but nothing was done in response.

12) I am extremely afraid of Mr. Coleman. He looks at me in a threatening manor whenever I see him. He has keys to my house. Other women have told me about him entering their homes without knocking uninvited, including while they are sleeping.

13) I am coming forward now, with counsel, to put a stop to this behavior and to help other women in Baltimore public housing.

I swear and affirm, under penalty of perjury, that the facts in the forgoing affidavit are true and accurate based upon personal knowledge.

  
Jacqueline Kiana Morant