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## **Report on Traumatic Childhood Events Affecting Terrance Williams**

### **Qualifications**

1. I am a clinical psychologist and Associate Professor of Psychology at the University of Massachusetts Boston, where I teach, and conduct and supervise research in the doctoral program in clinical psychology. For the past 25 years, I have been researching the causes and consequences of interpersonal violence, and I have studied the impact of childhood physical and sexual abuse on later development, especially in men. My research has been published in numerous scholarly journals, and I have presented scores of papers, symposia, and workshops at conferences throughout the United States and Canada.
2. I am an active member and a Fellow of the American Psychological Association (APA), and an active member of the International Society for Traumatic Stress Studies. I was the founding editor of the journal, *Psychology of Men and Masculinity*, a scholarly journal published by APA. In addition, I was a founding member of the National Organization on Male Sexual Victimization, now re-named *Male Survivor*, I am a founding board member of *1in6*, a Los Angeles-based non-profit organization focused on outreach and treatment for male victims of sexual abuse, and I serve on the national advisory board of *Peace Over Violence*, another LA-based non-profit organization that provides services to victims of violence.

3. In addition to my research and teaching, I am a licensed health care provider in the State of Massachusetts. For many years, I maintained a part-time private practice specializing in the treatment of adult men who had been sexually and/or physically abused as children. Currently, I serve as a consultant and expert in a variety of forensic contexts across the United States and Canada. I have been qualified by courts as an expert on psychological trauma and childhood abuse and violence, and I have testified in state, federal and military courts. I have conducted detailed evaluations of scores of men either charged with or convicted of homicide and/or sex offenses at prisons and jails across the United States. I have served as faculty at judicial, prosecutor, and law enforcement training conferences on sexual aggression and psychological trauma in all 50 states, and have consulted to the U.S. Department of Justice, the Federal Bureau of Investigation, the U.S. Air Force, the U.S. Army, the U.S. Navy, the U.S. Marine Corps, the U.S. Coast Guard, the U.S. Department of Defense, local police departments, and to individual judges and prosecutors on matters pertaining to perpetrators of non-stranger sexual aggression, to the psychological and neurobiological consequences of trauma, and to the prevention of sexual violence.

4. Over the past 25 years, in clinical, research or forensic contexts, I have treated or evaluated hundreds of men who suffered childhood trauma.

5. My CV is attached.

## **Referral Question**

6. I was asked by the attorneys representing Terrance Williams to review documents and case records, and to evaluate Mr. Williams to determine the extent and impact of childhood trauma that he experienced.

## **Interviews and Documents Reviewed**

7. I interviewed Terrance Williams on three occasions – January 11, 2012, January 27, 2012, and February 29, 2012 – for a total of approximately 12 hours.

8. The following is a list of documents I reviewed in preparing this report:

- a. Psychiatric report of Dr. Edwin Camiel, Feb. 27, 1985
- b. Declaration of Patricia Fleming, Ph.D., March 11, 1997
- c. Declaration of Ralph Kaufman, MD, March 13, 1997
- d. Declaration of Julie Kessel, MD, April 6, 1998
- e. Letter from Julie Kessel, MD, April 28, 2004
- f. Letter from Ralph Kaufman, MD, April 10, 2006
- g. Declaration of Patricia Kemp, January 24, 1997
- h. Declaration of Theresa Fields, Dec. 5, 1996
- i. Veteran's Administration Hospital Records for Theresa Fields, 1995-1996 (excerpts)
- j. Declaration of Thomas Williams, Jan. 28, 1997
- k. Declaration of Marlene Cruse, Jan. 16, 1997
- l. Declaration of James Villarreal, Jan. 22, 1997
- m. Declaration of Peter Robinson, Jan. 29, 1997
- n. Declaration of Lucille Rogers, Jan. 16, 1997
- o. Declaration of Harriet Clark, Dec. 13, 1996
- p. Declaration of Steve Clark, Dec. 13, 1996
- q. Declaration of Gwendolyn Johnson, Jan. 8, 1997
- r. Declaration of Eleanor Hampton, Jan. 8, 1997
- s. Declaration of Nanlee Mitchell, Jan. 8, 1997
- t. Terrance Williams' Juvenile File, 1981-1983
- u. Psychiatric report of Dr. Anthony L. Zanni, Jan. 14, 1983
- v. Presentence Report of Dominic Brunelli, March 29, 1984

- w. Motion to Suppress Hearing, March 1, 1984 (Excerpts)
- x. Bench Trial, March 1, 1984 (Excerpts)
- y. Sentencing transcript, July 25, 1984
- z. February 14, 1985 (Excerpts)
- aa. Feb. 15, 1985 transcript (Excerpts)
- bb. Feb. 19, 1985 transcript (Excerpts)
- cc. Feb. 20, 1985 transcript (Excerpts)
- dd. Feb. 21, 1985 transcript (Excerpts)
- ee. June 3, 1985 – Deferred Sentencing transcript (Excerpts)
- ff. Jan. 14, 1986 transcript (Excerpts)
- gg. Jan. 15, 1986 transcript (Excerpts)
- hh. Jan. 16, 1986 transcript (Excerpts)
- ii. Jan. 22, 1986 transcript (Excerpts)
- jj. Jan. 27, 1986 transcript (Excerpts)
- kk. Jan. 30, 1986 transcript (Excerpts)
- ll. Feb. 3, 1986 – Penalty Phase Proceedings transcript (Excerpts)
- mm. April 8, 1998 transcript
- nn. April 9, 1998 transcript (Excerpts)
- oo. April 13, 1998 transcript (Excerpts)
- pp. PCRA Petition, Dec. 17, 1996 (Excerpts)
- qq. Habeas Corpus Petition, Dec. 19, 2005 (Excerpts)
- rr. Direct Appeal Opinion, *Commonwealth v. Williams*
- ss. Lower Court Post Conviction Opinion, Jan. 13, 1999
- tt. Appellate Post Conviction Opinion (Excerpts)
- uu. Habeas Corpus Appeal Opinion (Excerpts)
- vv. Philadelphia Prison Records, 1984-1996 (Excerpts)
- ww. Pennsylvania DOC Records, 1984-1996 (Excerpts)
- xx. Pennsylvania DOC Records, 1996-2011 (Excerpts)
- yy. Charles Poindexter declaration, Feb. 9, 2012
- zz. ██████████ declaration, Feb. 3, 2012
- aaa. Marc Draper declaration, Jan. 9, 2012
- bbb. ██████████ declaration, March, 2012
- ccc. Kevan D. Rahaman declaration, March 6, 2012

## **Findings**

9. Terrance (Terry) Williams was raised in an environment of extreme violence and pervasive and unrelenting abuse. This violence and abuse produced very severe psychiatric and psychological symptoms, as well as severe internal conflicts that were played out in his adolescent life. In the pages that follow, I will describe my findings under separate headings: “witness to violence;” “physical abuse;” “sexual abuse;” but it is crucial to understand that the impact of these childhood traumas is both interactive and cumulative. To suffer all of these severe traumas is qualitatively different from suffering each of them individually. The violence and abuse that Terry Williams suffered was so severe, and so sustained, that I would not expect any child subjected to such unrelenting trauma to emerge without severe and long lasting psychological damage.

### **Family Violence and Physical Abuse**

10. Terry Williams was the youngest of three siblings, each of whom was fathered by different men. He never had any relationship with his father, instead was raised by his single mother who provided for the family, but who also inflicted brutal beatings on Terry and often humiliated him in public.

11. Terry spent most of his childhood in a neighborhood of Philadelphia that a former teacher of his, James Villarreal, described in his 1997 declaration as an area beset by drug dealing, gangs and shootings. The street where Terry lived, Weaver Street, was a known drug street, and according to Mr. Villarreal, many of Terry’s peers were drawn into the drug trade. He noted that half of Terry’s 8<sup>th</sup> grade basketball team ended up in jail, three of them charged with murder.

12. In her 1997 declaration, Pat Kemp, Terry's mother, briefly addressed her own tragic upbringing, describing herself as a foster child. She confided more about her childhood to Terry, who relayed to me that she was brutally beaten by each of the many foster parents who "raised" her. She confessed to Terry that this is what she was taught to do with children. You beat them. She escaped from her last foster home when she was still a young teenager when her foster father savagely beat her and then tried to rape her. She lived on the streets, ate at soup kitchens and slept in shelters or on the streets. Years later, she took Terry to one the shelters and they both volunteered there.

13. Terry's mother inflicted on Terry precisely the parenting that she herself was subject to. Never loved or parented herself, she was incapable of loving Terry. She beat him mercilessly, she unleashed all of her own pent up rage in her beatings, and she passed her own helpless rage and humiliation onto him.

14. For any infraction, Terry was subjected to wild, out of control beatings with belts, fists, extension cords, switches, or anything nearby she could get her hands on. As terrifying as the violence and physical pain inflicted, was the vacant look in his mother's face when she inflicted them. "Her face just went blank," Terry said in the interview. "It was like she was there anymore. She was gone. I didn't know who she was. And she didn't know who I was."

15. Terry's siblings were also subjected to their mother's savagery. His half-sister, Theresa, stated in her 1997 declaration:

"My mother beat all of us, including Terry. Terry was beaten and I was beaten in front of Terry on many occasions. There was no telling when my

mother would beat one of the kids. There were times when we would get beaten for no reason. My mom's beatings left visible welts and bruises.

One time my mother poured hot boiling water on me when I was a toddler. I remember being in the hospital after my mother burnt me. The nurses would put white towels on the floor and try to help me walk. I would look behind me and see my own bloody footprints on the towels. For a long time after I got out of the hospital, layers of skin would peel off of my feet when my mother bathed me.”

16. Much of his mother's violence was witnessed by others. On one occasion, she was summoned to Terry's school because he had talked back to a teacher. When his mother was told about it, she flew into a rage and started beating Terry with her fists, bruising his face and bloodying his nose. The teacher, horrified, started screaming, and Terry's mother dragged him to the bathroom to wash off the blood. The next day, the teacher told Terry that she would never again summon his mother.

17. On another occasion, after a parent-teacher meeting at the school, Terry told his mother that the teacher had lied about something. This remark sparked his mother's fury. She immediately punched him in the face and then pushed him down a flight of stairs. Terry tumbled to the bottom, now cut and bleeding from the blow and the fall. A teacher witnessed the assault and screamed at his mother: "Don't do that to your son!" Terry's mother said that she didn't mean to do it. She then pulled Terry around a corner and immediately slapped him hard across his face. Marlene Cruse, a childhood friend of Terry's witnessed this scene, and described it in her 1997 declaration: "...she simply jerked Terry to his feet and dragged him from the school screaming at him. I will never

forget how shocked I and the other children were watching Pat beat Terry. It was even more shocking seeing all of the blood on the stairs and on Terry.”

18. Kevan Rahaman, another childhood friend of Terry’s, also witnessed the scene and described it in her 2012 declaration:

“While we were going up another set of stairs inside the school, we all stopped and watched as Terry’s mother was following him down these same stairs wailing on him as hard as she could. She was beating him in the head and back as he tried to get away from her on the stairs. He had his arms over his head, trying to protect himself and was begging her to stop. I think the most horrifying part of this was the trail of blood that was following Terry. He was attempting to cover his head and face as he hurried down the steps past all of us, but I could tell the blood was coming from his face. It was one of the worst things I’ve ever seen.”

19. For Terry, the public beatings were the worst because they added intense humiliation to the pain of the beatings. He described one such episode:

“One time, she had bought me a pair of GI Joe shorts. I was very excited, but she told me I had to come home early. I went out playing and lost track of time. Suddenly, the kids I was playing with warned me that my mom was coming. She met me a corner. I saw that she had something in her hand. I started telling her that I had lost track of time. She had the switch in her hand. ‘Please don’t beat me right here. Beat me at home.’ I begged her. But looking at her face I could see there was nothing there. She started beating me. I looked up and begged. She hit me more. I tried to



run, but she grabbed my collar and beat me. Her face all distorted, like her eye balled turned black. Like a mask. The same mask always, like she didn't know who you was or who she was."

20. Along with the savage physical abuse that she inflicted on Terry, his mother also tormented, belittled and degraded him. Kevan Rahaman described her as "extremely emotionally abusive" to Terry. One example: "She told him over and over again that his father was a "fucking faggot" and that he was going to turn out just like his dad."

21. When Terry was 10 years old, his mother married Ernest Kemp. His entrance into the family could have produced for Terry a desperately-needed adult male role model, something he craved. Instead, his entrance produced a second brutally abusive parent. Ernest was an alcoholic, and soon he unleashed his violence both on Terry's mother and on Terry. Terry's older half-brother, Thomas, who had had a significant role in caring for Terry, fled the house at 17 by joining the Air Force, and Terry's sister, Theresa left shortly thereafter, also for the Air Force. That left Terry alone with his mother to absorb Ernest's violence and abuse.

22. Reflecting on Ernest's violence during one of the interviews, Terry observed that Ernest was jealous of him and his siblings, jealous of the attention that their mother paid to them. He said that Ernest had never raised any children, and couldn't tolerate the fact that his mother gave some of her attention to someone other than him.

23. Terry's observation was echoed by his brother, who wrote in his 1997 declaration:

"Ernest was sick and deranged and suffered from mental problems. He was not mentally stable and his mental imbalance was evidenced by his

behavior. Besides being completely paranoid about our mother cheating on him and Terry having sex in the house, he was also insanely jealous of any little amount of attention that our mother would give to any of her children. When he would drink, his jealousy would become uncontrollable and he would beat, or attempt to beat, my mother and us.”

24. The tension and conflict in the family increased steadily, and with it, according to Terry, so did Ernest’s drinking. Terry became increasingly vigilant about the signs that Ernest was getting angry, that Ernest had been drinking. The latter was simple. Terry could smell it on his breath. The schism between Ernest and his mother eventually intensified to the point that she slept separately from him, and Ernest refused to allow the children to eat any food in the house that he had purchased.

25. “When he came home drunk, he was a terror,” Terry recalled. One time, he threatened Terry’s mother and she picked up his blackjack to defend herself. In response, Ernest pulled out his rifle and leveled it at her. Another time, Ernest pointed the rifle at Terry and threatened to kill him.

26. Ernest’s violence was unbridled. On one occasion he assaulted Terry’s mother with the led-filled “blackjack,” splitting open her scalp and sending her to the hospital where 12 stitches were required to close her wound. She returned and smashed a frozen steak into Ernest’s head, knocking out two teeth. “The fighting was so bad that the kids never wanted to stay home,” Patricia Kemp (Terry’s mother) wrote in her 1997 declaration. “My children and I had to be on guard every second... After years of abuse I finally learned to protect myself with a bat. I kept the bat by my bed at all times to protect myself.”

27. Terry's mother also protected herself from Ernest's alcohol-fueled violence by escaping the house, sometimes for weeks. But when she did so, she did not take Terry with her. She abandoned him to Ernest's rage. Left alone in the house, Terry cowered in his bedroom, tried desperately to keep a lock on his door, and endured repeated assaults by Ernest, who would smash through his door and level his jealous and paranoid rage at the only target left to him: a 10 year old boy.

28. When she left the house, Terry's mother was fully aware of the violence that Ernest was capable of, and fully aware that she was abandoning Terry to suffer that violence alone. In her 1997 declaration, she described Ernest as extremely jealous of the kids, and as mean and nasty toward Terry, always yelling and screaming at him. She described how Ernest once tried to push Terry down a flight of stairs, and once pushed him so hard when Terry was in the shower that he fell and hit his head.

29. In her 1997 declaration, Marlene Cruse, an ex-girlfriend of Terry's who knew Terry for much of his childhood, recalled how deeply hurt Terry was by his mother's repeated abandonments. Marlene once heard Terry's mother tell him that she did not love him in the way that a mother is supposed to love her child, a confession that devastated him.

30. Despite his mother's abandonment, and her confessed failure to love him as a mother, Terry remained desperate to try to protect her from Ernest's violence. Like all children who witness violence between their parents, Terry felt responsible for protecting his mother despite the fact that he was a child, and despite the fact that he was the target of that same violence, violence from both Ernest and his mother.

31. Among those who witnessed the violence in Terry's home was a family friend, Nanlee Mitchell. In her 1997 declaration she recalled: "Once when I picked Terry up to take him to practice, he told me that Pat and Ernest were arguing again. I could see how upset and shaken Terry was by the abuse that his mother suffered. It was also frustrating for him that he could do nothing to protect or help his mother."

32. In his 1997 declaration, Thomas Williams, Terry's half brother, stated:

"Overall our family was dysfunctional. It was a very sick relationship between my mom and Ernest. They would beat the hell out of each other, then patch themselves up and then beat the hell out of each other again. Terry had years to live through all of the chaos between mom and Ernest before he was old enough to go to college. Theresa and I both have difficulties in our lives that stem from the way we were raised and the conditions in our house. I have my own problems and have been in trouble with the law. I can imagine that Terry has also suffered due to his childhood, especially since he had to live with the abuse and chaos by himself for many years after Theresa and I were gone."

### **Sexual Abuse**

33. Boys who are sexually abused are much more likely than girls to be abused by someone outside the family. The most vulnerable boys are those who are under-supervised at home, because they are identified by sexual predators as far easier targets than boys whose parents are more closely monitoring their whereabouts, their acquaintances, and their activities.

34. Terry Williams was a prime target for sexual predators. He was raised by a single mother, so he had no father watching over him. His mother worked hard to provide for Terry and his two siblings, so she was often away from the home. In fact, in her 1997 declaration she acknowledges that Terry's older brother, Thomas, was often left in charge of both Terry and his sister, Theresa.

35. Sexual predators identify children like Terry, and they typically groom both the child and the child's parent. They earn the parent's trust by seeming to take an interest in the child, and by expressing their willingness to spend time with the child, to provide guidance. Often, they also spend money on the child, buying him clothes or other items. By grooming the parent, they appear to be not just harmless, but actually beneficent figures in the child's life.

36. This modus operandi is how neighbors, coaches, teachers, and priests gain access to children whom they then use to gratify their sexual impulses and desires. Tragically, Terry Williams was targeted twice by such sexual predators. After grooming both him and his mother, these predators repeatedly raped and abused him, leaving him profoundly scarred, and profoundly confused about his sexual identity. Scarred and confused, Terry was then an easy mark for other predators – older men who trolled Terry's neighborhood looking for young, teenage boys whom they could lure into sexual acts in exchange for money, and in some cases in exchange for a wholly false sense of friendship.

37. Terry was first sexually abused by an older neighbor named Peter Robinson. According to Terry's mother, when Terry was 6 or 7 years old, he came home from a

visit to Robinson and told her that Robinson had hurt him. He apparently told his mother enough that she understood that he had been sexually abused.

38. Robinson was about 5 years older than Terry, and Terry looked up to him. He began to show an interest in Terry, and one day brought him to his mother's house and sat down with him to watch cartoons on television. He made a peanut butter and jelly sandwich for Terry and sat down next to him on the couch opposite the television. Out of the blue, he told Terry that he wanted to see his penis. He convinced Terry that this is what friends do with each other. Terry was confused and bewildered, but he allowed Robinson to pull down his pants and to begin playing with Terry's penis. Then he tried to stick his finger into Terry's anus and Terry began to squirm. Terry was now frightened and confused. Robinson took off his clothes and maneuvered Terry around and suddenly Terry felt Robinson apply Vaseline to his anus and then insert his penis into Terry's anus. Terry cried out in pain and started crying and told Robinson to stop. Eventually, Robinson did stop. He withdrew his penis from Terry's anus and then rubbed it between Terry's buttocks until he ejaculated. He then got a towel from the bathroom and wiped the ejaculate off of Terry's buttocks and back.

39. Robinson told Terry not to tell his mother about what had happened. "Friends don't tell on friends," he warned. Terry was frightened and confused. He thought of Robinson as an older brother. And he felt dirty and guilty about what had happened, and intensely ashamed, as though he was responsible for it. This is almost invariably how children react to being sexually abused, by internalizing the "dirty" and "shameful" feelings, believing that it is they who are dirty and shameful, and so they are intensely motivated to keep it a secret.

40. Robinson raped Terry a second time, and Terry cannot remember how much time elapsed between the two rapes. Robinson once again lured him to his mother's house, where he was living, and this time offered him cupcakes. As Terry began to eat a cupcake, Robinson began to fondle Terry's penis. He pulled down Terry's pants and began to fellate Terry. Then he again maneuvered Terry around, put Vaseline on his anus and penetrated him with his penis. Terry cried and squirmed and began screaming because this time Robinson would not stop, and he pushed and thrust much harder than the first time. The pain was excruciating. When he ejaculated, he withdrew his penis, picked up a towel and threw it at Terry and told him to wipe himself off. Terry wiped the area around his rectum and saw blood on the towel. Terry remembers telling Robinson, "You hurt me." Robinson responded by turning Terry around and opening his buttocks with his hands to inspect his rectum and telling Terry, "it'll stop." He then threatened Terry not to tell anyone.

41. Terry went home and stayed in his room. After this second rape, he avoided Robinson and made sure that was never alone with him. Eventually, Robinson and his mother moved to another neighborhood. Terry was left profoundly scarred, not only by the painful and violent rape, not only by the assault on his fragile sense of himself as a boy, but also because he had trusted Robinson and his trust had been cruelly betrayed. "I had trusted him, and he just wanted to use me for sex because he was bigger and stronger, and I really didn't understand it."

42. Male victims of sexual abuse almost invariably suffer profound confusion about their sexuality. They are plagued by doubts and questions, and feel such intense shame that they are desperate to keep the abuse a secret. So they are left utterly alone to

struggle with their doubts and confusion: Did he (the abuser) pick me because he somehow knew that I'm gay? Am I gay because I let him penetrate my anus or fellate my penis?

43. Often compounding their confusion is the fact that the abuser successfully caused them to have an erection during some part of the abuse, simply by fondling their penis. The abused boy sees this as a sign that they must have wanted it, or must have enjoyed it, and that they therefore must secretly be homosexual. What these boys do not understand is that stimulation of the nerves in the penis will cause it to become erect, and it will very often do so regardless of how confused or frightened the boy is. The erection is simply a physiological response that has nothing to do with the boy's willingness, enjoyment, or sexual orientation.

44. Terry was thrown into utter and desperate confusion by the rapes committed by Robinson, and he was utterly alone in his desperation. He began having some sexual experiences with girls from his school, and his attraction to these girls only compounded his confusion.

45. Terry also had several sexual encounters with a boy in his neighborhood, [REDACTED]. He and [REDACTED] and fought several times in the past. One night, [REDACTED] was drinking beer and he approached Terry. He asked Terry he would let him rub his penis against Terry's buttocks. Terry agreed to it, and [REDACTED] began rubbing his penis and also fondling Terry's penis, which became erect. [REDACTED] then offered to fellate Terry, and Terry agreed to it.



46. This occurred several times. One time, [REDACTED] asked if he could penetrate Terry's anus, and Terry agreed to it. But when [REDACTED] did so, it hurt badly and Terry told [REDACTED] to stop and he did.

47. Terry stated that around this time he noticed that there were older men who would come into his neighborhood who would approach Terry, talk to him, and proposition him, offering him money in exchange for sex. Terry acknowledged that he liked the attention that these men gave him, but he did not agree to their offers.

48. Terry's behavior during this period is very consistent with the behavior of many boys who have been sexually abused, particularly when the abuse is perpetrated by another male. In addition to the intense confusion about sexual identity that is caused by the abuse, very often these boys believe that their worth is somehow tied directly to their value as a sexual commodity. This is especially the case when the abused boy craves attention from older males because of an absent father.

49. Mr. Johnson was a teacher in Terry's middle school. One day he approached Terry at school and told him that he wanted to help him. Somehow, Johnson found out that things were not easy at Terry's home. His mother had escaped Ernest's violence, leaving Terry alone to deal with it. After making this approach, the next day Johnson picked up Terry at his home and took him out to buy groceries, at Johnson's expense. Then, instead of returning Terry to his house, Johnson suggested that they go for a ride. He took Terry to a restaurant, and over a meal told Terry about his family in North Carolina, and suggested that perhaps Terry could move down there and stay with them; play sports and go to school there. From the restaurant he drove Terry to his own apartment which was behind a Howard Johnsons restaurant. Once there, he poured

himself a drink and began offering to buy Terry clothes, food, or whatever Terry might need.

50. Johnson was grooming Terry, but despite his previous experience with Robinson, Terry trusted him. Johnson, after all, was much older, and a teacher; a man with authority.

51. After several outings like the first, Johnson took Terry to a house that he had just moved into. There, he told Terry that he looked tense, and that he would give Terry a massage to help him relax. He told Terry to undress. At this point, Terry was beginning to feel uncomfortable, but he also felt that he owed Johnson because of all the kindness he had shown him. So he got undressed and allowed Johnson to massage him. Within minutes he felt Mr. Johnson's erect penis on his buttocks. Johnson pulled Terry's underwear down and began rubbing his penis on Terry's buttocks. He tried to insert his finger into Terry's anus, then used some sort of gel and did it again. He told Terry: "You're not relaxed. I'll teach you to enjoy it." He then inserted his penis into Terry's anus and kept thrusting until he ejaculated.

52. Terry felt stunned. He wanted to call a friend, to tell someone what Mr. Johnson had just done to him. "But I just lay there." Johnson started telling him that he loved Terry, and that he wanted to have sex with him because he loved him, and that he would buy Terry clothes and food and anything that Terry needed.

53. Johnson's grooming and rape of Terry completed the process of utterly confusing Terry about who he was, what his value was, and what his sexuality was. He felt like he gave up, acquiesced. Johnson would bring him to the house, give him food, fellate Terry, and then rape Terry. It happened repeatedly. "I learned that any man who was

nice to me only wanted to have sex with me,” Terry stated during the evaluation. “Their motives were not pure.”

54. The rapes by Johnson plunged Terry into an even deeper level of confusion and despair. He tried desperately to have a normal life, to go out with girls, to be the star athlete, but underneath this façade he was roiling with pain, confusion and rage.

Increasingly, he began to find refuge in alcohol, in drugs, and in self-mutilation. He would cut himself, watch himself bleed, and see the blood flowing out of him as a release of the pain that kept building up within him, and for which he had no answer.

55. He cut himself when he was alone, but at times the pain and anger and confusion became unbearable when he was not alone, and at such times he would appear to act bizarrely. One such episode was witnessed by his girlfriend at the time, Marlene Cruse, and by Peter Robinson, both of whom described it in their respective 1997 declarations. Cruse described Terry as losing control and banging his head against the wall inside the house, and then moving outside and banging his head so hard on the sidewalk that he had to be taken to the hospital. Robinson described the same episode:

“Once when I was down the street from Terry’s girlfriend’s house, I heard a commotion coming from her house and I went to see what was going on. When I got there, Terry was banging his head on the wall hard. Terry then went outside and was banging his head off the concrete and bricks. He was also pulling and tearing at his skin. Throughout this incident, Terry was screaming uncontrollably. While he was screaming, nothing that he was saying made any sense, it was completely illogical. I tried to console Terry and find out what was going on with him but the more I tried to talk

to Terry, the more irrational he became. Terry then walked back up to the front door of the house and was banging his head on the outside of the door. Finally Terry was taken to the hospital. The doctors told Terry's mother that Terry needed psychiatric help. Unfortunately, Pat never took Terry to get help for his problems."

56. What nobody knew about Terry was that he was spiraling into a vortex of pain that he could not contain. He was having constant nightmares in which a man with a huge penis is coming toward him and he has to fight him off and he wakes up thrashing and sweating. He began cutting himself in part because he was feeling such intense hatred – almost all of it directed at himself – that cutting himself was the only way he could find relief.

"I cut myself whenever I felt overwhelmed. The main thing was why did I let these men do these things to me? I hated them and I hated myself afterwards. These older men, instead of just caring about me all they wanted was sex. I was reliving all the things that these men were doing to me, the pain in my anus...everything was just coming all at once and I couldn't take it."

57. Cutting, typically referred to in the psychiatric literature as "self-mutilation," is a common symptom of severe childhood trauma, including sexual abuse. Terry's description of what he experienced when he cut himself – relief from unbearable pain, tension and agitation – is echoed in the scientific literature on self-mutilation. The sources of Terry's unbearable pain were numerous, from the pervasive physical abuse he endured to the repeated rapes and sexual abuse he suffered throughout his young

life. The sexual abuse in particular left Terry roiling in an irresolvable morass of self-hatred, anger and confusion about his sexual identity.

58. The episode at Marlene's house that both Marlene and Robinson witnessed was triggered by an intense wave of anger and confusion. "I wanted to be with women, with Marlene, but I let these men do these things," he recalled. "I remember feeling confused about my sexuality. Was I gay because these people did this to me? Was I bisexual? The message was that if you had a sexual experience with a homosexual then you are one, but I didn't feel that. I didn't feel that way."

59. He tried to have sex with Marlene and started crying. "I loved my girlfriend. I was attracted to girls; never attracted to men; never sought them; they were coming on to me, so I was really confused. I couldn't talk to anybody about any of this because I felt they would reject me." He was overwhelmed, but couldn't cut himself because Marlene was there, so in desperation he began banging his head. "I couldn't tell her or anyone else what was going on inside me."

60. Increasingly, Terry turned to drugs to help medicate the pain and confusion that overwhelmed him. Valium and marijuana helped to calm him. Methamphetamine and cocaine gave him energy and stemmed the despair that was always threatening him. His drug of choice became the speedball: a mixture of cocaine and methamphetamine. It turned his depression and anguish into euphoria, temporarily.

61. Drugs, and the drug culture, were omnipresent in his neighborhood, and Terry's involvement in that culture led inexorably to deeper trouble. In December, 1982, at the age of 16, Terry was arrested and charged with armed robbery. Pending trial, he was placed in juvenile detention in January, 1983 and there he suffered another violent rape.

His cell was at the end of a hallway. One evening, after watching television, he returned to his cell and was followed by two older juveniles. They entered his cell after him and immediately began beating him. When they had beaten him into submission, they took turns anally raping him.

62. Terry has very rarely spoken about this rape. He believes that it broke something inside him. He had terrifying nightmares for years afterwards. A man would come into his room with a huge, erect penis, and try turn Terry over. He would awaken in a state of utter terror.

63. When he was released from the juvenile facility he felt broken and withdrawn. But he was also seething with anger. The rape in the juvenile facility was layered over the rapes by Johnson and the rapes by Robinson. Together, they spanned a decade of his life. "I turned angry. The slightest sign of disrespect, or someone saying something to me to hurt my feelings, and I'd get really angry. And I was less trustful."

64. Terry was wrestling with other symptoms and legacies of the repeated rapes he had endured. After each practice, Terry and his fellow football team members would return to the locker room, shed their equipment, and head for the showers. Except that Terry would not. He could not tolerate being naked in close proximity to other males, so he would put on his street clothes and leave. Terry was now constantly vigilant around groups of men, and deeply distrustful. "I always felt that just around the corner somebody might be coming."

65. Terry developed a medical problem as a result of the repeated rapes he had suffered. Like many survivors of childhood sexual abuse that involved anal rape, Terry developed a fixation about sensations that stemmed from his anus or rectum. Any

sensation that was similar to the sensation of a penis being forced into his rectum was intolerable to him, and triggered flashbacks of the terror and helplessness of being raped. As a result, when he felt any buildup of stool in his rectum, that sensation of pressure was similar enough to the sensation of a penis inside his rectum that he felt compelled to force out the feces. To do so, he would sit on a toilet and push with tremendous force in a desperate attempt to force the fecal matter out of his rectum. He did this so chronically that he developed an extremely severe hemorrhoids problem, one that afflicted him for many years. This medical issue was actually noted in the testimony of Dr. Julie Kessel in her 1998 testimony. She considered the number of his gastrointestinal and urogenital problems, including a prolapsed rectum and hemorrhoids, to be “notable,” and “consistent with somebody who would have conflict about sexuality.”

66. In the wake of the gang rape in January, 1983, Terry’s mental state was clearly deteriorating. He routinely cried himself to sleep, feeling utterly miserable; a damaged and disgusting person whom nobody could or ever would love. His confusion about his sexual identity was now so complete that he experienced it as irresolvable. And he believed that he could never tell anyone about it. “In our [African-American] community, if you’re labeled something, it can be really harsh. So all this had to be a secret. You want your friends and family to accept you, but I was too embarrassed to talk to anybody. I always thought it was my fault because I didn’t fight back.”

67. Terry’s deterioration was noticeable to others. Lucille Rogers, the mother of Terry’s girlfriend, Marlene, saw a steady decline in Terry’s functioning and an increase

in his turmoil over the course of his teenage years. Ms. Rogers had observed Terry's relationship with his teacher, Mr. Johnson, and in her 1997 declaration she stated:

"The situation with Mr. Johnson and Terry made me nervous because I believed that Mr. Johnson was taking advantage of Terry sexually...The abuse that Mr. Johnson inflicted on Terry then played a big part in Terry's growing up. Mr. Johnson slowly corrupted Terry when he was a young child and Terry was unable to see what was happening until it was too late. Terry was extremely ashamed of what Mr. Johnson was doing to him but he was only a child and felt unable to control the situation. Terry was acquainted with Mr. Johnson from 5<sup>th</sup> or 6<sup>th</sup> grade through high school. After Terry started hanging out with Mr. Johnson, I also started to see in Terry a confusion about his sexual orientation. This abuse and exploitation of Terry caused so much confusion and damage to Terry that I do not think he ever fully recovered from it. Looking back, I can see how confused and hurt he was and I realize now that he desperately needed professional help to deal with all that he suffered. Unfortunately Terry never told me about this until years later."

68. Ms. Rogers watched Terry deteriorate noticeably from about the age of 15. His relationship with her daughter suffered, and Terry "started to get angry, frustrated, and confused more easily than before. I noticed that he became exceedingly paranoid."

69. Terry's middle school teacher and coach, James Villarreal, stated in his 1997 declaration that he knew that Terry's confusion about his sexual identity and his inner turmoil eventually led him into drug use.



70. Terry's deterioration during these years was so pronounced, that when he was given a formal psychiatric evaluation in February, 1985, as part of a presentence investigation, the psychiatrist who conducted the evaluation, Dr. Edwin Camiel recommended that Terry be immediately transferred to a prison psychiatric facility:

"This individual shows evidence of a developing Psychotic disorder of a paranoid type. There are acute signs of psychotic decompensation including an inability to sleep, intense anxiety, feeling of pressure all over his body, psychomotor agitation including hand wringing, and a development of a paranoid delusional system."

71. Peter Robinson, in his 1997 declaration, also recalled marked changes in Terry's behavior in his teenage years. He started drinking more and more, and went from beer to hard liquor.

"Terry was soon drinking every day...Terry also started smoking pot every day and soon started doing harder drugs. I know that Terry had developed a cocaine habit while he was hanging out with Marc [Draper]. By the time Terry was around 17 years old, he was strung out. He started to sell cocaine in order to support his habit. Terry has told me that he has also had sex with older men in exchange for drugs."

72. Those older men whom Terry was having sex with in exchange for drugs, or the money to buy drugs, included Herbert Hamilton and Amos Norwood.

### **Relationship between Childhood Trauma and Homicides**

73. It can be difficult to understand why someone who had been repeatedly raped as a child would voluntarily engage in sexual acts with older men. Terry was in fact

intensely conflicted about these sexual encounters. He felt sexual attraction to girls, and had intense, loving feelings towards his girlfriend, Marlene. Simultaneously, however, Terry was engaged in a profound struggle with the legacy of years of sexual abuse and rape. While the gang rape at the juvenile facility in 1983 was an overt, violent assault, the earlier rapes by Robinson and Johnson were preceded by and embedded in a manipulative, mind-bending web of false friendship, false love, false trust, and bribes. Robinson and Johnson were much older than Terry, and they used their superior age and more advanced maturity to manipulate Terry and ultimately to leave him in a twisted state of utter confusion, self-doubt, and shame.

74. One legacy of these many years of manipulation was that Terry came to believe that his value as a person hinged on his value as a sexual object, an object that older males craved in order to satisfy their sexual impulses and desires. Terry was systematically shaped into this belief. Robinson and Johnson preyed on Terry's childhood need for the love and attention of an older male, a male who could at least partially fill the empty space left by his absent father. They lured him into sexual acts by exploiting his need for an older male's attention, and then rewarded him with food, clothing and money.

75. Terry was inducted into this sordid "trade" as a child, long before he could possibly have understood that he was being exploited and manipulated. As he grew older, he began increasingly to hate himself for participating. He felt intense shame and disgust, and loathed himself. And over time, some of that hate began to turn towards the men who preying on him.

76. The evidence from trial testimony and declarations of witnesses indicates that Herbert Hamilton and Amos Norwood were middle-aged men who preyed on teenage boys for the purpose of obtaining sexual favors from them. In exchange for sex, they doled out money, clothes, and food. Both Hamilton and Norwood preyed on Terry, giving him money, telling him they were friends, and in Norwood's case, even telling Terry that he loved him. Unbeknownst to them, the teenager they were manipulating for sex was an increasingly paranoid, volatile and angry youth who had suffered more than a decade of rapes and sexual abuse.

77. Terry first met Herb Hamilton at Cheney State University. They were introduced by [REDACTED], a fellow student at the university, and Hamilton's live-in lover. In his March, 2012 declaration, [REDACTED] described his own relationship with the middle-aged Hamilton. According to [REDACTED], Hamilton was an ex-state trooper from North Carolina who ran a drug-dealing operation that earned him considerable cash. He obtained prescription drugs from several local doctors and sold them on the street. [REDACTED] also described Hamilton an intimidating individual who could be aggressive when he wanted something. [REDACTED] met Hamilton when [REDACTED] was 16 years old and he acknowledged that, "There was no mistaking that I was under his control." When [REDACTED] parents vehemently objected to his relationship with Hamilton, [REDACTED] moved out and began living with Hamilton.

78. [REDACTED] stated that Hamilton used his money and power to lure teenage boys into sexual relationships, not only with himself, but with several of Hamilton's friends. Nor was Hamilton above using coercion when necessary. "Herb once forced himself on

one of my friends. Herb told the boy, "You gonna give me some..." He could be intimidating. He had money, power, size and could talk a mean game."

79. According to [REDACTED], Hamilton gained access to groups of young teenagers, especially student athletes, by providing sports equipment to whole teams or to individual star athletes. Once they accepted one of his gifts, however, there was always a quid pro quo; they owed him. "This usually meant meeting one of his two older friends or letting him take photos of two of the boys having sex," [REDACTED] stated in his declaration. Hamilton's use of his money and power to gain access to teenage boys and to then manipulate and coerce them into sexual acts is typical of the modus operandi of serial sexual predators.

80. Hamilton began grooming Terry at their first meeting in Marc Draper's dorm room. He offered Terry a ride, and then gave Terry his phone number and told him to call whenever he needed a ride to college. Terry next met Hamilton after a football game. Hamilton offered Terry and his girlfriend a ride home. About two weeks later, Terry called Hamilton and asked for a ride to the college and Hamilton agreed.

81. A short time later, Hamilton called Terry and told him that he had a pair of Adidas he wanted to give to Terry. He came by, picked up Terry, and told him that he wanted Terry to meet a couple of his friends. Hamilton drove Terry to Robert Hill's house. Once there, Hamilton told Terry that he wanted Terry to do a favor for him. He said that Hill wanted to watch Terry masturbate, and he would give Terry \$200 to do so. Hamilton promised that Hill would not touch him, and that he had nothing to fear. Terry agreed, but when he went into Hill's room, Hill was naked and masturbating. Terry suspected that Hill and Hamilton wanted more from him, so he left.

82. About two weeks later, Terry once again asked Hamilton for a ride to college. Hamilton picked Terry up and told him that he had forgotten something and needed to stop at his house. When they got to Hamilton's house, Hamilton told Terry to relax and have a drink. Terry sat down on the couch to watch TV but Hamilton told him to watch the TV in the bedroom. Once there, he brought in a paper bag and started showing Terry photographs of nude men. He asked Terry to pose nude for him. When Terry said no, Hamilton got mad and left the room. When he returned, he was naked, and he told Terry: "You won't leave until you pose."

83. Terry described what followed as a wild, chaotic fight, in which Hamilton stabbed Terry, and Terry stabbed Hamilton, and in which Hamilton threw Terry against a kerosene heater, burning his back. "We were fighting everywhere," Terry said during the evaluation. Terry grabbed a bat and struck Hamilton in the head, knocking him to the floor. Terry then stabbed Hamilton repeatedly. He stated that he had no prior intention of harming Hamilton; that it was in fact Hamilton who drove them to his apartment; and that Hamilton had threatened him. Terry's description of the frantic, desperate nature of the fight, and the number of stab wounds that he inflicted on Hamilton, are consistent with the rage that he was increasingly feeling towards all of the men who had exploited, abused and raped him over the course of his life.

84. Charles Poindexter was the Pastor at St. Luke's Church where Amos Norwood was director of the Youth Theater Fellowship and also in charge of the acolytes. In his 2012 declaration, Poindexter stated the following:

"Despite the good work that Amos was doing for St. Luke's, it first became apparent to me and a close circle of friends at St. Barnabas that Amos

might be leading some sort of double life. We noticed that he spent almost all of time working with young men, but never women. Amos seemed to have lots of close relationships with young men, most of whom I didn't know. We began to suspect that Amos was having inappropriate relationships with young men...I suspected that Amos's death may have been related to his relationship with young men, especially because this was not the first time that Amos had gotten himself in trouble or disappeared. On several different occasions in the years before his death, Mamie called me to report that Amos was missing. Sometimes he would be gone for a few days, and I recall one time where he was gone for about a week. Mamie told me that sometimes young men would show up at his house looking for him, and they would keep coming back over and over again."

85. Poindexter's suspicions were later confirmed:

"I learned that Amos would sometimes meet up with gay men in a house or apartment in center city. I believe the place was on Locust Street. I heard about this place a number of times during my conversations with the police...I later learned that in addition to buying or serving the boys food and having them spend the night, Amos would loan them money."

86. Poindexter also received information, long before Norwood's death, that Norwood may have also been preying on young boys at St. Luke's church:

"A couple of years before Amos' death, I was approached by the mother of a 15-year old boy at St. Luke's. She told me that while Amos was driving

her son home from a youth group event, Amos touched her son's genitals.

She also told me that Amos had inappropriately touched a number of other boys at the church. The mother and her son eventually left the church."

87. [REDACTED] was a member of St. Luke's Church throughout his childhood. In his February, 2012 declaration, [REDACTED] stated that when he was 16 or 17 years old Amos Norwood propositioned him. "He said something like I won't hurt you and you won't hurt me." [REDACTED] rebuffed Norwood and told his mother about the proposition and she told Pastor Poindexter about it, but apparently Poindexter did not pursue the matter. Sometime later, [REDACTED] told a friend about the incident and his friend disclosed to him that he too had been propositioned by Norwood.

88. In their respective declarations, both James Villarreal and Lucille Rogers stated that Norwood was known in the community for engaging in sex with young boys.

Villarreal stated:

"I have spoken to several people in the community and it is known that the victim in this case, Amos Norwood, molested young boys. I have spoken with such people and I understand that there are people from the victim's congregation that would not allow their children to go on outings with Mr. Norwood because they knew of his molesting other children."

89. [REDACTED] in his 1998 testimony, and Marc Draper in his declaration, state that they knew that Terry and Norwood were involved in a sexual relationship. [REDACTED] testified that he did not view Terry's sexual relationship with Norwood as "consensual" because Norwood "was just into getting his kicks out of kids." [REDACTED] also testified that

on one occasion Norwood had “swung a leather belt” at him, something that Terry would also experience.

90. Terry stated to me that he first met Norwood years before the homicide. They were both in a neighborhood deli, Norwood was buying beer, and he approached Terry. He told him he was a “nice-looking boy” and asked had he ever thought of doing some modeling. He gave Terry his phone number, and Terry asked him if he paid, and Norwood said he did. They walked out of the store together and Norwood went to his car. Terry saw there was a teenaged boy in the car.

91. Two days later, Terry called Norwood and they arranged to meet in Germantown. Norwood told him that the modeling business was not going well, but he invited Terry to come to a hotel in New Jersey the next day where there was a get together with some friends of his. Terry agreed, and the next day Norwood drove him to the hotel. There were a number of people at the get together, drinking beer and talking. Soon, everyone left and Terry and Norwood were alone. Norwood told Terry that he was attracted to him and that he would pay Terry to have sex with him. He wanted Terry to penetrate him, and he would pay Terry \$200. Terry agreed to it. Norwood also wanted Terry to hug and kiss him, but Terry refused, which angered Norwood. After the sex, Norwood asked if he could call Terry again and Terry said yes.

92. “He was a kind person,” Terry said during the evaluation. “I’d seen that older guys just needed someone to care about them. I felt sorry for them. At least, in my mind then, that’s what I thought.”

93. However, the next meeting with Norwood was more conflicted. Norwood drove him to the same hotel, and this time Norwood wanted to penetrate Terry. They argued



about it and Norwood told Terry that he was paying him too much money for Terry to simply refuse what he wanted. Norwood also took off his belt and said he wanted to whip Terry across his buttocks and legs. The argument became heated, but then Norwood suddenly stopped, dropped to his knees and began apologizing to Terry, saying "I'm sorry, that's not who I am." This oscillation between contrition and guilt on the one hand, and violent sex on the other, became a pattern in their encounters. Norwood could be kind and caring, and then demand specific sexual acts and become rough and violent, and then become overwhelmed with guilt and ask Terry to pray to Jesus with him for forgiveness.

94. During their third meeting Norwood again pressed Terry to allow him to penetrate him anally. Terry again refused, this time explaining to Norwood that "something happened" to him when he was a little kid, and that anal penetration hurt him too much. But Norwood kept cajoling him, and promised Terry that he would be very gentle. So Terry relented. "But then when he did it, he forced himself inside me and had an orgasm, and he had a whip, a short whip, and he took it out and started to beat me on my legs. I grabbed him and told him I could hurt him." Terry's reaction triggered another bout of contrition from Norwood, who apologized and told Terry that whipping was something that he liked to do because it turned him on and he didn't intend for it to hurt Terry.

95. Terry acknowledged that he kept meeting with Norwood because he needed the money. But he also still felt torn. Part of him was still yearning to be accepted and cared for by an older male, still trusting enough to be repeatedly betrayed.

96. As the meetings with Norwood continued, the pattern continued, and the violence escalated. "The last time he brought out the belt and started beating me with it I got really angry. He hit me in the face and bit my ear and my nose; he had me pinned down. I punched him a few times." This time, in addition to expressing his remorse, Norwood gave him extra cash -- \$500.

97. For Terry, it became increasingly difficult to maintain even the faint thread of belief that the men with whom he was trading sex for money and drugs had any interest in him other than to use his body for their sexual gratification. As that faint thread of belief withered away, it was replaced with an intensifying rage: at Hamilton, at Norwood, at Johnson at Robinson; at all of the men who had raped, abused and exploited him.

98. On the night of June 10, 1984 Terry and Norwood met up and Norwood drove to a parking lot on the grounds of what was locally referred to as the "monastery." The parking lot was towards the back of the property, mostly surrounded by woods, and completely unlit. Norwood wanted to have sex with Terry there in the dark. Terry recounted what happened next:

"I took my pants off. It was dark. He made me lean against his car and he penetrated me from behind. This night he was rough in penetrating me. He didn't use any Vaseline. I felt hurt and mad because he was rough with me that night. He forced himself into me. I told him to stop. He kept on. I was clenching my anus so tight trying to stop him but he wouldn't stop and it hurt so bad I screamed."

99. When Terry got home later that night, there were blood stains on his underwear. The next day, while he was gambling with Marc Draper on the street near Norwood's

home, he still felt the stinging pains in his anus and he was still very upset about what had happened the night before. He had been taking Valium all day; he thinks that by the evening he had taken at least six 10 mg pills. "They helped me forget, almost washed my memory clean," Terry recalled during the evaluation.

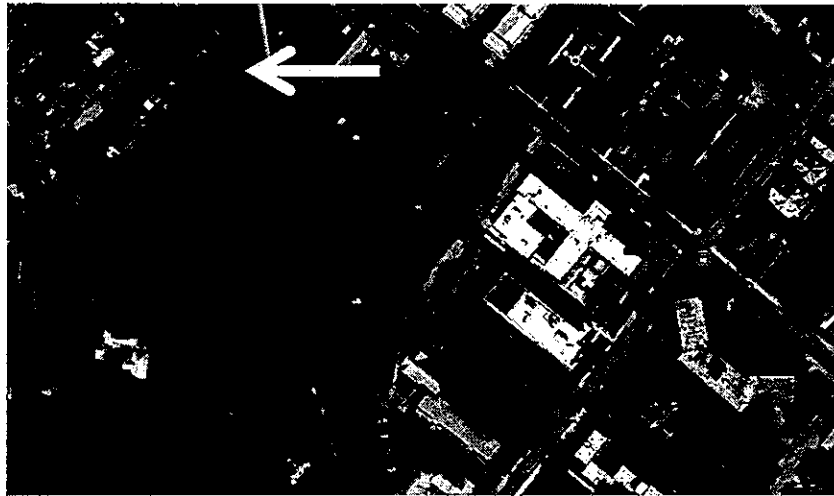
100. Terry stated to me that on the night of the homicide he had no plan to kill Norwood. However, the anger that had been intensifying in him for many months was overwhelming. "I was very angry, and very scared, and I just snapped. I wanted him to feel the pain that he had made me feel. I couldn't think clearly. I felt such anger and betrayal at everybody who had used me and betrayed me. I couldn't think of anything else." Terry remembers striking Norwood repeatedly – he does not remember which tool he struck with – and he remembers thinking and may have said out loud: "See what you did to me?! This is what you did to me!"

101. He may well have been yelling those words. In his January, 2012 declaration, Marc Draper stated that Terry "was acting really bizarre. He became enraged and was kind of losing his mind right before Norwood was killed. I felt threatened by him and fearful because he was going off like that. He got this distant and crazy look in his eyes."

102. Both Terry's description of his state of mind during the attack on Norwood, and Draper's description of him, are consistent with Terry acting in an acutely traumatized state triggered by both the violent actions that he was engaged in and the years of terror and rage that he had experienced at the hands of men who, like Norwood, had raped him.

103. When, two days later, Terry was driving around looking for a place to leave Norwood's car he finally left it off an alley behind Upsal Street. When I asked him why

there, he shook his head and said he had no idea. He was just driving around and decided that would be a good place. He had no idea until that moment that he had parked Norwood's car within a stone's throw of where Norwood had raped him the night before the homicide. (The red arrow indicates where the rape occurred; the yellow arrow indicates where Norwood's car was found.)



### **Conclusion**

104. Terry Williams suffered a succession of sustained traumas over the course of his childhood that utterly undermined his development and were directly related to the crimes for which he is now incarcerated. His mother brutally abused him, both physically and emotionally, and so damaged his sense of self worth that he desperately sought the attention and approval of an older male, someone who could replace the father he never knew.

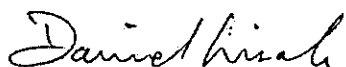
105. His desperate need was a vulnerability that drew sexual predators to him, beginning with Peter Robinson when he was six years old, and continuing throughout his childhood and adolescence. One by one, these men groomed him – they used their

age, their power, their money to instill in Terry an utterly false sense of trust – and then they used Terry’s body for their own sexual gratification. From the age of six Terry was systematically abused and sexually assaulted by a succession of sexual predators, including one of his teachers.

106. The rapes and sexual abuse instilled a profound level of confusion in Terry. He was traumatized, and he was utterly confused about what the abuse meant about who he was. The sexual abuse he suffered was so pervasive, and so chronic, that it literally distorted his sexual identity. He felt sexually attracted to girls, to his girlfriend in particular, but the abuse and sexual grooming by male predators left him doubting himself and his own body. This confusion created such intense inner turmoil that Terry resorted to cutting himself, and to other acts of serious self-injury.

107. Terry’s confusion about his sexual identity, and his constant struggle with the traumatic legacies of the abuse he had suffered, led him to seek respite in alcohol and drugs. His confusion and turmoil also left him extremely vulnerable to the predations of middle-aged men who looked for teenage boys whom they could bribe for sex.

108. Terry’s involvement with these men, including Herbert Hamilton and Amos Norwood, only served to intensify the inner conflict and turmoil that threatened to overwhelm him. Increasingly, he experienced these men as extensions of the men who had raped and abused him as a child.



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March 6, 2012