

IN THE COUNTY COURT OF THE  
NINTH JUDICIAL CIRCUIT, IN AND FOR  
OSCEOLA COUNTY, FLORIDA

STATE OF FLORIDA

Plaintiff,

vs.

[REDACTED]

Defendant/Petitioner.

CASE NO: [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**STATE OF FLORIDA'S STIPULATION  
TO PETITION TO EXPUNGE  
BASED UPON BEING A HUMAN TRAFFICKING VICTIM**

COMES NOW the State of Florida by and through the undersigned Assistant State Attorney, and states as follows:

1. The State of Florida stipulates to the petitioner's request to expunge the above cited criminal records under Florida Statute Section 943.0583 based on the petition's compliance with the statute's requirements and the State's review of the information contained within the petition's affidavit and/or supporting official documentation.
2. The State has reviewed the petitioner's proposed order, which conforms to the requirements of Florida Rule of Criminal Procedure 3.989(g).
3. The State also requests that this Honorable Court grant the petition to expunge in an expedited manner, given the Legislature's dictates that victims of human trafficking are often forced to engage in a variety of illegal acts beyond prostitution, and because their criminal records reflect their involvement in the sex industry, they face barriers to employment and other life opportunities long after they escape from their trafficking situations. Section 943.0583 is the solution to alleviate the impact of collateral

consequences of the trafficking related criminal histories of these victims. See Preamble to Section 943.0583: CHILDREN AND MINORS—TRAFFICKING—EVIDENCE, 2013 Fla. Sess. Law Serv. Ch. 2013-98 (C.S.C.S.H.B. 1325).

4. The State further stipulates to the petitioner's requested return of court costs and fees she paid totaling \$2,790.40. *See Nelson v. Colorado*, 197 L. Ed. 2d 611 (2017) (holding that a state has no right to keep court costs or fines paid in criminal case based on an invalid conviction).

**WHEREFORE**, the State of Florida stipulates to this Honorable Court entering an order granting said petition and return of court costs and fees totaling \$2,790.40.

I CERTIFY that a copy hereof has been furnished to [REDACTED]



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