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"It Depends on the Cop:" Street-Based Sex Workers' Perspectives on Police Patrol Officers

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Abstract Based upon 50 interviews that took place over the course of 3 years of ethnographic research with 100 female street-based sex workers in Denver, Colorado, the tenth largest city in the United States, this article explores the cultural ethos informing women's interactions with police and the tools women use to navigate their struggles with homelessness, addiction, and the everyday violence of the street. It identifies three beliefs about patrol officers that reflect the complexities of women's interactions with police: arrest is indiscriminate in a "known prostitution area," arrest avoidance strategies necessitate interpreting behavioral cues while showing respect to officers and forming affective bonds with potential clients, and officers may abuse their authority. This belief system is part of an environment in which women's stigmatized behaviors are highly visible and constitute an increased risk of negative police encounters. Changes to policing practices remain unlikely while women's sex work and drug use activities remain criminalized. Findings presented support arguments for decriminalizing prostitution as well as the implementation of harm reduction-oriented social policy, including services that inform women about their rights in the criminal justice system while facilitating awareness of how their individual lives intersect with gender, class, and racial bias in a sociolegal system that stigmatizes and criminalizes their choices.

Keywords Sex work · Policing · Homelessness · Criminal justice system · Drug use · Sex work policy

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Introduction

This investigation draws upon data collected through 3 years of ethnographic fieldwork with approximately 100 street-based sex workers in Denver, Colorado. It aims to explore normative beliefs and practices that inform women's decision-making processes as they interact with or seek to avoid police, and ascertain implications for services providers. Research findings presented here identify three beliefs related to police that reflect the complex and fraught sociolegal environment in which street-based sex workers operate: arrest occurs indiscriminately, certain skills reduce likelihood or frequency of arrest, and some police may abuse their power. These beliefs reflect a cultural ethos wherein the illegal, stigmatized behaviors that heighten women's risks of negative police encounters also constitute the quotidian means by which they navigate their struggles with homelessness, addiction, and the everyday violence of the street.

The Research Context: Setting, Study Population, and Policing Practices

Denver, the tenth largest US city, is the only urban center for thousands of miles in the vast expanse of the US West. Sex work, while a policed, stigmatized activity today, is very much a part of popular cultural understandings of the American Western heritage due to connections between sex work and the growth of an economy fuelled almost exclusively by male-dominated resource extraction industries (Dando 2009; MacKell 2009). The romanticized historical vision of frontier brothels depicted in US popular cultural representations of the American West, however, does not reflect the situation of contemporary Denver street-based sex workers, most of whom struggle with homelessness, addiction, and compromised mental and physical health.

Colorado law classifies street-based sex work as a misdemeanor offense in the category of "public order crime," as US law terms offenses thought to disrupt a community (Meier and Geis 2006). The most recent available Federal Bureau of Investigation statistics reported 2,072 Denver prostitution arrests between 2006 and 2010, with an annual high of 625 such arrests in 2008 (OJJDP 2011). Denver is a predominantly white city, with residents self-identifying as 70 % white (non-Hispanic), 32 % Hispanic (including those who self-identify as "white"), 10 % African-American, 2.8 % Asian, and 1.3 % Native American (US Census Bureau 2012), and yet city court records indicate that only 45.8 % of women arrested for prostitution are white; 29.6 % are African-American, and 18.5 % Latina (Morris et al. 2012, p. 49). The majority of participants in the present study were African-American, with smaller numbers of women who self-identified as white, Latina, and, in small minority, Native American. Women of color in this study are overrepresented in street-based sex work relative to their overall Denver population size; this unfortunately mirrors women of color's overrepresentation in the US criminal justice system (Clarke et al. 2012; Richie 2012).

The women who participated in the study work in a Denver neighborhood where street-based sex work is commonplace and occurs in tandem with high rates of crack cocaine sales and use. In this environment, women describe their moneymaking strategies as opportunities that evolve during their daily encounters with men both known and unknown. For instance, a situation in which an unfamiliar man pulls over to offer a woman a ride can quickly transform into a mutual agreement to exchange sex for money. These encounters generally produce three outcomes of equal likelihood: completion of the sexual transaction, the woman's arrest by a patrol officer who encounters the couple (or by the unfamiliar man himself if he is an undercover officer), or the woman's decision to steal from the man while he is distracted during the sex act.

Women reported that moneymaking opportunities often happened at random, and that the risk of arrest always accompanied the transaction. Most sex-for-money exchanges take place in men's vehicles or in a room at approximately one dozen nearby motels. The high costs ($60–80 per night) of motels in the area relative to women's earnings, and women's need to avoid motel management's ire by bringing men to the room, also makes vehicular sexual transactions, which tend to be quicker, an attractive option. However, as a participant noted in reference to the unpredictability of the sex worker–client encounter, particularly with respect to violence, "once you get in that car, you just never know."

It was partly in response to the high rates of violence faced by women involved in street-based sex work that Denver's criminal justice system instigated of one of the first US "end demand" initiatives targeting sex workers' clients in 1994. This initiative mandated that clients pay a $1,000 fine that was in turn used to purchase newspaper space to publish pictures of men arrested for approaching women they believed to be sex workers (Dodge et al. 2005). Law enforcement continues to pursue this practice, primarily along Colfax Avenue, where most street-based sex work takes place, through metro Denver and the suburbs of Lakewood and Aurora, where undercover female officers pose as sex workers in sting operations that typically result in dozens of arrests of clients, who also risk having their vehicles impounded (Dodge et al. 2005).

These policing practices, which occur less frequently, exist simultaneously with regular police presence (and consequent high levels of arrest) in Denver neighborhoods known for high levels of street-based sex work. Such policing practices, and the legislation that informs them, criminalize women for engaging in the street-based sex work and drug use activities that make up the majority of their everyday lives. These laws and policing practices place Denver street-based sex workers at high risk of arrest and force them to engage in behaviors that may compromise their health and safety. Findings presented here support research suggesting that criminalization and punitive policing practices increase street-based sex workers' risk of facing potential harms and indicate that policymakers interested in promoting women's health and safety should support decriminalization of their sex work activities.

Literature Review

This article's analysis draws upon research with US street-based sex workers from the fields of critical medical anthropology, feminist ethnography, and, to a lesser extent, interdisciplinary work on the US criminal justice system. It employs this research as a framework to demonstrate how interactions between police and women in urban public spaces reflect culturally embedded exclusionary processes. Findings presented in this article build directly on this framework by offering an account of how, in extremely constrained circumstances that criminalize and stigmatize their income generation strategies and lifestyles, US street-based sex workers subscribe to a cultural ethos that both reflects and resists the world in which they operate.

Research with US street-based sex workers by critical medical anthropologists emphasizes that problematic substance use, violence, and criminalization intersect as mutually reinforcing agents of harm. This body of work argues that individuals' physical and mental health is inherently dependent upon the sociocultural contexts in which they live and work. Anthropologist Merrill Singer, for instance, developed the concept of the SAVA syndemic, in which substance abuse, violence, and AIDS intersect disproportionately among those who face social stigma and discrimination (Singer 2006).

Gendered power inequalities are likewise inseparable from the ways that individuals experience addiction, homelessness, violence, and other limiting circumstances that have a dramatically negative impact upon almost all indicators of well-being (Bourgois et al. 2004; Romero-Daza et al. 2005).

Researchers in related areas of social science, particularly sociology, have identified factors that increase street-based sex workers' risks of violence, including working while using crack or heroin, needing money, and having sex in a car (Kurtz et al. 2005); these are normalized working conditions for most street-based sex workers (Edwards et al. 2006). However, women may be reluctant to seek services, even when available, due to stigma's totalizing impacts, previous negative experiences, as well as to the high rates of trauma among this group of women (Dalla et al. 2003). US street-based sex work poses great risks in comparison with other forms of sex work, including the highest rates of female homicide (Brewer et al. 2006; Quinet 2011); researchers estimate that street-based sex workers' risk of being murdered is nearly 100 times higher than their female counterparts who do not engage in this form of sex work (Salfati et al. 2008). Likewise, a long-term public health study in Colorado Springs, a one hour drive from Denver, found that the major causes of death among sex workers were violence and drug abuse (Potterat et al. 2004; Brody et al. 2005).

Feminist ethnographic research with US street-based sex workers emphasizes the complex nature of the women's lives and the intersections of gender, race, and class that constrain them in particular ways. Homelessness and its uniquely gendered dynamics, including the frequency with which women must form protective relationships with men, only compounds these risks (Jasinski et al. 2010; Kushel et al. 2003), as does criminalization of women's sex work and drug use behaviors. Such research carefully examines the ways in which street-based sex work is itself a form of resistance to—or even liberation from—such social constraints (Maher 2000). Anthropologist Claire Sterk, in her work with street-based sex workers in New York City and Atlanta, contextualizes women's sex work and drug use behaviors within the social norms that frame their lives, rather than isolating them as variables distinct from other dynamics that undoubtedly inform their choices (Sterk 1999a, b).

Rhetorician Jill McCracken, likewise, sought in her research to describe the processes by which street-based sex workers identify particular behaviors as moral or immoral, all within a cultural landscape that invariably positions them as immoral and stigmatized individuals (McCracken 2013). Rather than assuming that street-based sex work constitutes a desperate consequence of addiction and homelessness, such feminist work clearly positions street involvement within the broader cultural forces that create and inform it, such that freedom and constraint are constant bedfellows (O'Connell Davidson 1999).

Research on the US criminal justice system generally concedes that legal and public policy-related knowledge production about street-based sex work generally reflects deeply embedded social norms surrounding gender, class, and race (Richie 2012). The violence of criminalization, stigma, and discrimination have a powerful impact on the practice of law enforcement, such that in the US, individuals with mental illness and substance abuse problems, including street-based workers face disproportionately high levels of arrest and incarceration (Etter et al. 2008; Kushel et al. 2005; Surratt et al. 2005). Indeed, visibility in public space has been a key factor in police discretion in making prostitution arrests since at least the 1950s (Kleinig 1996).

Literature regarding US law enforcement's modes and practices suggests that police surveillance presents street-based sex workers with health and safety risks, such as work in unsafe areas and limited condom use due to need to complete the sex act quickly in heavily policed areas (Blankenship and Koester 2002). These realities underscore how laws and policing practices designed to eradicate street-based sex work and maintain public order actually create health and safety risks for women who violate gendered sexual norms.

Methodology

Parameters and Scope of the Broader Study

This study is part of a larger project that has been underway for 3 years with more than 100 women involved in street-based sex work, which they perform primarily in cars, alleys, or motel rooms in the neighborhood where they solicit clients. The project sought to identify: (1) how women define coercion in their everyday work experiences and (2) women's help-seeking practices. The project's ethnographer, anthropologist Susan Dewey, designed an open-ended interview guide consisting of twelve questions grouped into three thematic areas designed to ascertain normative street-based sex work behaviors, definitions of and experiences with work-related coercive practices, and help-seeking behaviors. In the first, normative practices, Dewey asked women about reasons for entering street-based sex work, earnings variance by neighborhood, distinctions between good and bad dates, and negotiation processes with clients. The second, on coercion, asked women about pimp relationships, pressure to engage in unwanted sexual acts, intimidation with clients, and movement between cities. The third, on help seeking, elicited information on women's encounters with services providers, gaps in services, and recommendations for how police and social services providers might interact with street-based sex workers differently.

Susan Dewey, the ethnographer, included the statement "you or anyone you know" in each question such that

respondents could choose to avoid implicating themselves in illegal activities in an environment replete with undercover police. This interview method allowed the most latitude for women's story telling such that a respondent would often include a discussion of other women's experiences in conjunction with descriptions of her own, thereby providing valuable contextual information about their life worlds.

Research Team and Procedures

The research team, led by Susan Dewey, consisted of an anthropologist, a feminist legal scholar Tonia St. Germain, a student researcher, Misty Heil, and Laurallee Rucker, a former street-based sex worker from the neighborhood who, at the time of the research, worked as a staff member at a Denver transitional housing facility for women leaving sex work. Dewey carried out all 50 interviews discussed in this article herself, while Rucker assisted with recruitment via chain referral ("snowball") sampling in a neighborhood characterized by high levels of street-based sex work and crack sales and use. Dewey and Heil transcribed all interviews and employed open coding with a codebook they developed for that purpose subsequent to transcription. St. Germain reviewed both the original interview transcripts and the coded materials that form the basis of analysis presented here.

Dewey and Rucker selected a motel room as an ideal location because it offered women a familiar location with sufficient privacy for an interview. Dewey and Rucker recruited women on the street by making eye contact with a potential interview participant, introducing themselves as researchers, offering a rapport-building cigarette to the potential respondent, and then explaining the purpose of the study. None of the women approached refused to participate, partly because Rucker was so trusted and highly regarded in the community. They recruited half of the 50 respondents on the street using this method and, at the end of the interview, asked women to inform their colleagues of the study. The remaining 25 women who participated in the study learned about it from previously interviewed participants, who told them the hours they could come to the motel room for an interview.

While each woman had her own unique set of experiences, at the time of the interview, all self-identified as homeless, crack-dependent, and engaged in street-based sex work. A majority of respondents were African-American and in their thirties, although ages ranged from 18 to 63. Approximately half of the women grew up or had lived in the Denver area for at least 10 years and had family in the vicinity of where they worked. African-American women reported far higher rates of family support and contact than did white women or Latinas. Most, but not all, women expressed a desire to leave street-based sex work due to the considerable risks it posed to their health and safety.

Ethics

The University of Wyoming's Institutional Review Board approved this study. Ethical procedures followed in the study reflect the research team's enormous respect for the women who daily negotiate the risks inherent in criminalized street-based sex work and drug addiction. Each participant received a $20 financial honorarium along with a small plastic bag containing three condoms, hand sanitizer, deodorant, and inexpensive cosmetics, and information about a Denver transitional housing facility for women leaving sex work. The ethnographic valence of the cigarette, small cash honorarium, and plastic bag of small gifts lies primarily in its relevance to the women's lives and work, particularly the condoms, hand sanitizer, and the $20, a typical amount charged for oral sex in that neighborhood. Many women noted this approvingly during the interview.

Dewey, the ethnographer, learned the cultural dynamics of this unique community of women by living for several days a week in a Denver transitional housing facility for women leaving the sex industry. This preparatory aspect of the project served an important ethical purpose in that she was a familiar face to many street-involved women as a result of her participation in outreach and other activities related to the community. In short, the women had at least some evidence that Dewey cared about them because, in a number of cases, they had previously met her or had seen her warmly interacting with other street-involved women. This trust-building measure was crucial to establishing rapport with women who daily face the risk of arrest, a reality that informed the team's confidentiality procedures. The research team maintained no records of women's names and, at the start of each interview, asked women not to mention others' names; if women did mention names, these were not recorded in subsequent transcriptions in order to maximize confidentiality. Dewey continues her voluntary work with the Denver transitional housing facility, which gives her regular opportunities to help inform the facility's evidence-based programming initiatives, through which she attempts to meet her ethical obligations to the women and the larger community in which they live and work.

Rationale and Process Guiding Data Selection and Analysis

Given that law enforcement was not the focus of the study, the research team was quite surprised by the frequency and depth with which women discussed their experiences with police patrol officers, who are typically their first point of contact with the criminal justice system. The open coding process, which involved two

months devoted exclusively to detailed review of the transcripts by Dewey and Heil in conjunction with the study objectives, identified 35 distinct themes (with hundreds of subthemes) that occurred in more than half of the 50 interviews. These included narratives of entrepreneurship, experiences with clients, codes of conduct and penalties for violating these, perspectives on pimp relationships, and social support systems.

The theme "police on beat" was one of the few coded themes that occurred, without exception, in every single interview and, as such, the research team determined that this was a significant finding. Dewey and Heil excerpted all interviews transcript sections dealing directly with this theme into a single document of several hundred pages in length, which Dewey and St. Germain reviewed in detail to identify the findings presented in this article.

Findings

Women interviewed consistently expressed three beliefs about police patrol officers. First, women felt that arrest is fundamentally indiscriminate as a consequence of what they described as all-encompassing police authority and their interactions with men in a what police describe as "known prostitution area." Second, respondents expressed that women can develop arrest avoidance skills, such as interpreting social and environmental cues to identify and respond to undercover police, requiring clients to engage in illegal or other affective bond-forming behavior, and showing respect to police officers by not engaging in particularly flagrant sex work-related behavior. Third, women detailed the potential for police officers to abuse their authority and described examples of rights violations as well as police physical and sexual victimization they reported experiencing or hearing about. Less frequently, women also offered neutral or even positive interpretations of officers as potential providers of assistance or, more mundanely, workers just doing a job.

Indiscriminate Nature of Arrest

Visibility in public, coupled with high arrest rates, means that patrol officers and women can often recognize one another. However, women almost universally describe their likelihood of arrest as determined by a rather random process that involves a combination of their decisions and those of the patrol officers they encounter in the course of the daily activities, which almost always involve illegal drug use that may also subject them to arrest. As one participant concisely summarized, "you're gonna get arrested. Now the what, where, how, and why, that depends."

Police Harassment with Impunity

Women conveyed the belief that officers operate with a degree of impunity that encourages harassment of women they suspect of engaging in street-based sex work and did so in both abstract statements about policing, as well as in concrete examples of their own experiences of harassment by officers. More abstract statements and ways of speaking about officers' powers as somewhat unfettered by law tended to focus upon their discretionary nature; "'protect and serve' nothin'," one woman stated, "they out there fuckin' with everybody." Another woman echoed this in noting that officers made life difficult for her and her peers irrespective of their guilt: "they harass you when you ain't even doin' nothin', they harass you when you is doin' somethin'."

Respondents believed that while police had the ability to exercise power over them, the ways in which individual officers exerted that authority was a matter of personality. Women attributed similar behaviors to individual officers as a result of domineering personality traits, such as a respondent who described, "this one set of cops, they're called 'Batman and Robin' …no matter if you're nice to em or not they're still the asshole cops, you know, they think everybody should go down- if you jay walk you should go to jail for twelve days." Respondents contrasted such zealous officers with those who appeared to have had personal experiences that influenced their perspectives on their work. One woman noted that, "…with cops it's kinda, 'has something specific that I'm out here doin' on the street that has specifically affected my family or me somewhere in my life?' And, if so, yeah, then I'm gonna bust every prostitute that I can out there … because you just never know, if his brother picked up a girl and then he ended up getting something from her and he gave it to his wife."

A few women reported feeling victimized by officers who threatened that women's statements would meet suspicion if they contested officer's claims in court or at the station following their arrest. One woman recalled being approached by a patrol officer while seated in the car of a man who offered her a ride but with whom she had not intended to have sex in exchange for money:

> That man wasn't gonna get no sex from me, if I got two dollars in my pocket I'm doin' better, y'know what I'm sayin'? But he basically told the officer that he wanted to pay me for sex and the officer told me, "All I need is him saying, I don't need you for anything." He told me specifically, "I could charge you because of what he said, I don't need nothin' from you."

While women may have attributed far more authority to patrol officers than the officers actually have, their observations indicate their membership in a culture wherein most individuals feel that police have the ability to restrict their mobility in public space through harassment in multiple forms.

Arrest Results from Interactions in a "Known Prostitution Area"

The Denver neighborhood that was the focus of this study has been well known as an area characterized by drug and prostitution activity since at least the 1970s. High rates of poverty among all neighborhood residents, irrespective of whether or not they engage in illegal activities, encourage particular types of gendered social interaction. For instance, neighborhood women generally regard men driving cars as potential sources of transportation, money, or both, in an environment where these are scarce resources. Women's relative lack of access to these resources results in economic vulnerability that sometimes leads to arrest.

Women reported that they did not always get into men's cars with the intention of engaging in sex work but rather due to the offer of a ride, which they felt emerged from their sexual powers to attract men:

> I been in many situations, okay, ain't got nothin' to do with prostitution. It could be about the dope game, it could be about "I need to get down there to see my loved one" … because I don't know how many men I use to get rides, I don't use em for sex, I don't use em for money, I jump in the car. They think they about to get a date, child, please. I jump in that car and I tell em where I need for him to take me.

A number of women had been arrested once they accepted an offer of a ride and then consented to engaging in transactional sex. Respondents noted that undercover officers, like potential clients, use the ride-offering strategy to make arrests; in such instances, as one woman noted, "once you get in the vehicle you're busted."

Women also reported that explicit offers of specific amounts of money in exchange for particular sex acts also occurred unexpectedly so that, "it could just be a girl walking and just minding their own business for a minute and the guy pulls up, and then it just pops into her head, 'okay, I am broke' and then, yeah."

> I was just goin' to the store and dude offered me forty bucks. What in the hell I's supposed to do? And I got in the car and he went, drove just a little bit, and here come the police … what happens a lot, you go out … somebody'll offer you some money, well, you ain't got it and now you gonna take it … He said, "I'll give you fifty bucks if you'll do us both" and he got me on film, on tape and everything.

This respondent's stark portrait of a situation, in which "you ain't got it and now you gonna take it," fundamentally underscores the sometimes rapid decision-making processes that women must engage in every day. The resulting situation is one in which undercover police (or prospective clients) may approach all women and girls in the area under the suspicion that they are sex workers. Women clearly articulated their sense that being female in a "known prostitution area" combined with the stigma of sex work to present women with a reasonable risk of arrest. A respondent expressed frustration at patrol officers' tendency to suspect all women of exchanging in sex work, such that all neighborhood encounters between men and women become potential targets of police intervention:

> … don' assume that cause I'm walkin' with this dude or I'm in a car with a guy that I'm prostituting. And they always do that, and they try to pick me up for prostitution. They try to pick me up when I was in a car wit' somebody and we was just drivin'. They pull over the car, "oh, yeah, you a prostitute in there?" That's what I'm talkin' about, "you a ho, you a ho!" and they just, "you're a walking sex pot, what can you do for me?"

Women observed that their gendered "walking sex pot" status defied age; one older woman, who had engaged in street-based sex work in the 1970s, described her outrage at being stopped by a young officer while walking to the store. "Come on!" she reported telling the officer, "you're talkin' to an old lady here, who lives here!" Other women recounted incidents of harassment, by both potential clients and undercover police, while walking with young female relatives. One respondent observed that, "I walked down the street one time with my daughter, one of my step-daughters and, they was blowin' they horns and, uh, I, 'get away from us!' cause she doesn't do that."

Some respondents attributed this to neighborhood realities, including the very limited income generation opportunities for women struggling with addiction and homelessness. One woman explained that, "since they've seen so many women on the street they just think that all the women are doing the same thing." This respondent acknowledges that patrol officers face a situation in which it is difficult for officers to assess which women may be involved (or intending to become involved) in illegal activities. Women regarded policing practices as totalizing and invasive, sometimes prompting respondents to explore scenarios in which help-seeking or other necessary activities, such as finding a ride to the emergency room or simply walking in public, could potentially result in their arrest.

> Respondent 1: …they try to come up with new stuff all the time to try to keep you from gettin' in any vehicle, regardless of, like, if I was stabbed and I needed to go to the hospital, and I stuck my thumb out because I needed a ride to go to the hospital, they could get me.
> Respondent 2: "What are you doing walking around down here?" "Because I ain't got no other way to get up and down the street! You gonna buy me a car?" "Why you on this side of town?" "Because I need to get to this side of the street." "Who do you know over here?" "It's none of your fuckin' business." "How come you don't know his (the client's or potential client's) last name?" but who knows people's last names these days? Only officers and people in the Army, this is not 1960, dude.

Yet even in a such resource-scarce environment, women also find ways to avoid arrest.

Strategies for Arrest Avoidance

Engaging in street-based sex work necessitates the development of arrest avoidance strategies, particularly when police approach women under the suspicion that they are soliciting clients, or when police pose as clients during an undercover operation. Although women described arrest as indiscriminate, and a routine part of life, they also reported that it was possible to develop skills and abilities that could potentially diminish their likelihood of arrest. The most common arrest avoidance strategies women described involved interpreting social and environmental cues to identify and respond to undercover police, requiring clients to engage in illegal or affective bond-forming behavior, and showing appropriate respect to patrol officers by not publicly engaging in particularly flagrant sex work-related activities.

Interpreting Social and Environmental Cues

One of the most important arrest avoidance strategies involved the ability to intuitively sense undercover officers, a skill women attributed to experience and the ability to "read people," "pick up on vibes," or "see through folks." Women most frequently used the word "sense" to describe the process by which they identified undercover police; as one woman noted, "sometimes I stand outside the car and if I sense it, I say, 'that's alright officer, you have a good day now.'" Linguistic and behavioral cues could also distinguish an undercover officer, such that women avoid men who repeatedly asked for the price of particular sex acts out of concern that the man might be recording her response. Persistent men may also be undercover officers desperate to make an arrest, as can those with the rigid body posture women believe characteristic of police. Likewise, new officers may overact; as one woman explained, "when you get in the car and they ask you if you're a cop right away, that's how you know, kind of, that they're insinuating that they might be a cop."

Clothing could also be a cue, particularly if a man was wearing a tightly zipped jacket; a woman noted, "if they zip up that far it's because they have a (bulletproof) vest on and they have a badge underneath." Women also memorize the license plate numbers of cars they believe contain undercover officers, and avoid these vehicles, yet women are also aware that police counter this strategy by using cars impounded in drug-related stings involving well-known men in the neighborhood:

> … while he [a prominent crack dealer] was in the holding [in jail, awaiting trial], they [police] was usin' his vehicle to go out and pick up females. You gotta really pay attention cause when you're out there on the streets you actually gotta *look* at the people behind the wheel of the vehicle, because you can see the same person drivin' by, tryin' to flag you down, wave you on, and then later on you'll see them in a different vehicle doin' the same thing, therefore you know it's a cop. You know, you gotta really pay attention to faces and if you're too high or you're too tired, that's what'll get you busted a lotta times.

This participant underscores how women's constant monitoring of social and behavioral cues requires hypervigilance under sometimes difficult circumstances in which exhaustion or intoxication impedes their observational abilities. In such situations, women reported that an additional arrest avoidance strategy could involve forming somewhat conspiratorial relationships with potential clients to ensure that they were not undercover officers.

Requiring Clients to Engage in Illegal or Other Affective Bond-Forming Behaviors

The practice of not stating a price for sex or feigning willingness to participate in a sexual encounter without expectation of remuneration also helped women to avoid arrest. Once in a potential client's car or other relatively private area, women ask instead for money to help pay an overdue bill or to buy food or a motel room for the night. Women's avoidance of explicit discussions with potential clients about the cost of particular sex acts deliberately draws upon heteronormative exchange practices wherein men have access to material resources (such as cash) and women have a coveted resource in their sexual power. The sexual transaction's price either remains unspoken, or only alluded to, when a potential client and a sex worker interact for the first time, both as a result of

the illegality and the intricacies of gender norms surrounding the exchange.

Just as women relied upon heteronormative exchange practices in developing strategies to avoid stating a price to a potential client, they also attempted to avoid arrest by asking, or requiring, that prospective clients engage in illegal acts, particularly drug use or genital exposure. Women based at least some of this knowledge upon their direct engagement with the criminal justice system, including experiences in court, which taught them that undercover officers have cameras in their cars and cannot do or say particular things. Consider how this respondent describes her strategy for proving that a potential client is not, in fact, undercover:

> The first thing, when he go directly to that or whatever, the first thing you do, you ask him, "are you a cop?" but he gotta prove it, cause a cop cannot touch you in no kinda way, and you can't touch them. So you grab his dick! Have him expose himself. He gotta take his pants off, or down, you know, and you have to touch him, cause a cop can't let you touch him. All cops got a camera in the car, so if he lets you touch him, they have to let you go.

However, women were divided with respect to the extent that undercover officers could actually engage in sexual activities. One woman described physical contact with an officer that most other women believed prohibited:

> I know in the state of Colorado, cops can pull out their stuff and have you touch it, and they can touch you. I got hemmed up like that one time and the cop actually put his hand down my shirt, and had me touch his stuff too, and he was a cop. And he drove about a block and a half from where he picked me up and there were cops everywhere, he was a police officer, he put his hand down my shirt, groped me, had me touch him, and he was a cop, all day long.

Women also avoid arrest by requesting a potential client to buy food or engage in other behaviors meant to form an affective bond between them. Establishing such a friendly bond is also beneficial with non-officer men, who may reach orgasm sooner when relaxed, thus facilitating what women describe as the generally desirable goal of a speedier sexual transaction. Respondents felt that undercover officers eager to make an arrest will not spend the additional time or money necessary to cultivate such an affective bond. One woman, referring to food served in the Denver County Jail, felt this was an effective strategy, "because the police ain't gonna buy you no damn sandwich. They waitin' to get you down there so you can eat that bologna and cheese!"

Respecting Officers' Authority

Behaving as if they respect patrol officers' authority is another critical arrest avoidance strategy. Women walk a difficult tightrope in their attempts to "stay under the radar", as one woman described her more discreet attempts to attract clients from the street, while working in a heavily policed neighborhood. Many articulated their position on this tightrope as part of what they glossed as "respecting authority", which involved avoiding conspicuous public displays, such as flagging down cars, wearing flamboyant clothing, openly carrying drug paraphernalia, and committing crimes other than prostitution. One recent migrant from a Southern state described an encounter in which she demonstrated respect for a patrol officer:

> They know what you out there doin', as long as you respect them, then they gonna respect you. I been stopped once, since I been out here… he said, "I'm not here to pick you up, but I could take yo' name", and I gave it to him. He said, "where you from?" and I told him, and he asked me why I didn't have a record, and I said, "cause I respect y'all. You know, you s'posed to respect the law." You know, so I stay out they way, I'm not gonna disrespect them, not gonna be flaggin' down no cars.

Respect for patrol officers also involved avoiding particular activities, as women felt that an established reputation as a person involved in criminalized activities other than sex work likely invites additional scrutiny from patrol officers, particularly when those activities have the potential to incite violent retribution. Engaging in sex work, but not stealing or other illegal behaviors, hence reduces chances of arrest; a respondent summarized this commonly expressed need to respect patrol officers' authority in order to maintain integrity on the street:

> You get a lot further just by telling the truth as compared to lying. If they know you out on the street as a liar or a thief or whatever else … you've already made a bad reputation for yourself with the police. This one's a runner or this one's a runner and a liar, this one lies continuously, this one lies and steals, whatever.

Such a "bad reputation" indicates a disrespect for the law that goes beyond what, for most women, is the need to engage in street-based sex work as a means to obtain money for drugs and other basic needs while facing precarious housing or homelessness. However, solely engaging in street-based sex work and drug use does not guarantee arrest avoidance, as women expressed strong resentment toward those who regularly disrespected patrol officers by openly flaunting their drug use and sex work activities. A respondent expressed her

frustration at being stopped three times that day by police, which she contrasted with a more flamboyant woman's experience:

> Girl been out there for the last ten days, with gold clothes on! She out there, got a [crack]pipe in her hand, brillo, and a pusher [crack paraphernalia]. She's walking down the street like this and they they don't bother her! She got makeup out to here, come from the 1970s, gold out to here, she look like she come straight outta *Solid Gold*, she was doin' everything!

Police as Abusers

Women's accounts of police abuse had taken place all over the USA, as some participants had worked in multiple cities. Women reported and offered interpretations of their own encounters with police in addition to sharing examples from the experiences of women they knew. These descriptions took three distinct forms: constitutional rights violations in which officers used excessive force or engaged in searches without cause, and physical and sexual victimization. Women also offered interpretations of police authority that acknowledged officers' potential role as providers of assistance or advice.

Constitutional Rights Violations by Police

All respondents described working in a neighborhood environment in which police subject them to constant scrutiny, including frequent searches involving unnecessary force and disrespect, and, in more extreme cases, the instigation of false charges. Many women attributed the disrespect with which some police patrol officers treated them to what they termed a "cop mentality," which they described as a rather concrete set of attitudes that dismissed women engaged in street-based sex work as criminal deviants. As one woman noted, "cops see the world in black and white, there ain't no color scale." This all-or-nothing mentality, according to most participants, encourages officers to view those who break the law as undeserving of the constitutional rights protections accorded to other citizens.

Women reported frequent searches by police as a result of officers' suspicion that they may be carrying drugs, a reasonable assumption in a neighborhood dominated by the crack economy. These searches, which generally occur on the street, happen quickly and without warning; a participant noted, "they get you up against the car and right away they start, y'know, on their pockets and what not, and to see if they got any [controlled substances], if they're carrying anything and stuff, and then they'll call in on em [to check for arrest warrants]." For many women, this was a frequent occurrence.

When searches take place in private, they do not always involve either the woman's consent or an authorizing warrant from a judge. One woman described caring for a friend's infant following the friend's arrest for prostitution, noting that the police, "kicked my door in and the baby was only a month old. I didn't even have custody papers or anything, and she was in jail. I had to lie and say it was my sister's baby." Dewey also experienced this invasion of private space by police, who on two occasions entered a motel room where she was speaking with women, without invitation, demanding, "what's going on here, ladies?" Such interactions contribute to a fraught context pervaded by fear of arrest.

False arrest by police also posed problems for women who expressed a belief that police could initiate charges against women at will, resulting in jail time prior to a prosecutor's decision that insufficient evidence existed to press charges. One respondent described a night spent in jail after she accepted a ride from an undercover officer who arrested her on prostitution charges:

> … next thing I know there's four cops cars like behind his car and they turn around and put me in the backseat but they started playin' like a tape recorder-like thing in there and they're like, "she was sayin' she just wanted to go home. This girl really just wanted a ride." I'm like, "you guys are doin' a sting on a whole fuckin' wrong thing here." … in the morning, and he (the investigator) said, "you shouldn't ever even have been arrested in the first place."

None of the 50 women interviewed reported knowledge of any negative consequences for officers who made arrests without cause, even when such an arrest resulted in a woman spending time in jail while waiting a prosecutor to determine that insufficient evidence existed to charge her. Women's sense of powerlessness regarding wrongful arrest and detention was compounded for those who reported receiving false charges in order to cover up police incompetence. For instance, a woman reported being arrested following an incident in which police were called to the scene of a fight and subsequently assaulted her:

> My kneecap is cracked in half. See my knee? That's the cops…they said, "why don't you walk toward me?" and I said, "okay." So I walked toward them, no weapons in hand, hands visible, everything, soon as I got to the door, they twisted my arm, kicked my knee out from this side, and beat my ass. Just beat my ass to a bloody pulp and then denied everything. All five cops denied that anything had fuckin' happened at all. Just like that, threw me in jail for a week under some false charges they gave me to cover their own ass for breakin' my knee.

Taken together, such accounts of constitutional rights violations paint a stark portrait in which women have no recourse to confront police abuse.

Physical and Sexual Victimization

Women described a continuum of physical and sexual victimization by officers that ranged from sexual assault or police misusing their authority to obtain free sex from women to what they regarded as unnecessarily rough treatment during arrest. Officers' concerns for their safety also inform these encounters since almost all street-involved women in the study neighborhood habitually smoke crack cocaine, the exhilarating effects of which can encourage dramatic overreactions that may include violence. The adrenaline-charged interactions between patrol officers and street-involved women lend themselves to escalation due to the speed with which these encounters unfold in an already highly charged environment. Thus, even in the best of circumstances, in which officers follow all the rules of police work and the street-based sex worker cooperates in her arrest, both individuals involved in the encounter are on high alert, concerned for their safety, and eager to minimize the risks of harm to themselves.

Many women drew little distinction between different types of violence perpetrated by police patrol officers, indicating that this continuum of behaviors seems predicated upon an understanding of physical and sexual violence as intimately connected. Women's vivid descriptions of their own or other women's experiences of arrest are replete with language underscoring the violence and vulnerability they felt characterized these encounters. Witnessing officers arrest other women for prostitution in public made a powerful impression on interview respondents, who described these events as essentially violent and demeaning. A woman noted that, "y'know right away they [police] just go up to em, grab em and some of em, they just throw em up against the car… like they're just a piece of meat, 'she ain't worth this,' y'know, 'boom!'."

The following speaker's description of particular officers whose "hatred" toward sex workers underscores the continuum of violence characterizing the arrest process:

> Police have a problem with keepin' their hands to their selves. Even if you move like this (moves slightly), they'll try to touch you … It's certain ones, with bad attitudes, tempers, hatred towards you. They just grab them up close like, "you need to stop, you need to stay still, you need to pay attention," like that.

Like most interview respondents, she is careful to mention that it is only "certain ones" who engage in abusive behaviors toward street-based sex workers. Women acknowledged these as a minority, and yet they were, understandably, the subject of respondents' anger and resignation. This frustration stemmed, in part, from the reality that most women saw limited likelihood that others in the criminal justice system would believe them:

> See some cops out here are crooked, like…they make em have sex with them so they won't go to jail or somethin' like that. Sometimes they do it and they take em to jail anyhow, and when they say, "oh well, he did this," he's like "no, I didn't." It's his word against hers, pretty much you get called a liar.

Respondents who had been working the street the longest, perhaps by virtue of their experiences and more extensive contact with other street-based sex workers, had the most disturbing stories of police sexual abuse. In these accounts, sexual violence took multiple forms ranging from trading sex with officers in exchange for the (sometimes unfulfilled) promise of not being arrested, to rape by officers. Respondents frequently interspersed their accounts of police sexual violence with statements emphasizing the veracity of their accounts, such as "you hearin' me?", a linguistic feature absent from other elements of their interactions with Dewey:

> I used to have to suck their dicks when there was warrants, and they wouldn't take me in. You hearin' me? I'm tellin' the truth, and there are some in there that'd do that to these girls out here with warrants (mimics officer's voice) "and if you don't get back here with me, we're takin' you in." It's been done to me.

Most respondent's accounts of police sexual accounts were like this one, with women acknowledging that certain officers would agree not to make an arrest in exchange for sex. However, while most reports involved just one officer and one woman, others, all of which came from US cities other than Denver, indicated a more systemic level of tolerance for police sexual abuse:

> I'm gonna tell you I used to see cops in uniform, in marked cars, zero in on women. They would zero in on one … and these were cops in uniform, in their cars, and they would pull into alleys and they would have the girl bent over in a marked car, in uniform, fuckin' her in a car, and then take all of her money to not send her to jail.

Street-based sex workers understandably feel their vulnerability to police abuse quite keenly in such an environment, even if the officers engaging in it constitute a minority.

Neutral or Positive Interpretations of Police Authority

Despite relaying stories about incidences of police disrespect or abuse, women acknowledged that police patrol officers have responsibilities to their jobs and communities. In some

ways, this speaks to the realities of life in an environment in which arrest is routine. In the words of one participant, "they just doin' they job, they doin' what they supposed to do." However, some women argued that focusing upon prostitution arrests resulted in police neglect of what they regarded as more serious crimes. Two respondents took particular offense at the notion that their stigmatized behavior should receive what they regarded as more attention than the violence and drug dealing in their work environment:

> Respondent 1: Sex is sex, and it's the oldest profession on the planet, and it's not ever gonna change. And if you're gonna make that worse than, I mean, I have literally seen cops where a gang shooting happens a block away, but you're more worried about busting a whore than worrying about that. There is something really, really wrong with that.
> Respondent 2: I understand the law and all that kind of thing but, don't make such a big fucking deal where like the only thing that you like zeroed in on is that, when there are robberies goin' on right down the street, there are gang shootings going on right down the street, there are men beating women right down the street, there are women beating children right down the street. There are so many other things that you could be thinking about, but you're worried about who's climbing into a car. That's repulsive to me.

A notable minority of women expressed the view that police, as workers with responsibilities to the community, could occasionally serve as help-provision agents. Women rarely described this sort of relationship, and when they did it was often with reference to a particular officer. These kinds of positive experiences with officers are rare partly because of street-based sex work's illegal nature, but also because of the adversarial relationship police officers have with the crack economy that dominates the neighborhood in which the women work and which, in most instances, motivates their sex work activities. However, this did not preclude all officers from engaging on what some women regarded as positive, respectful terms. Consider this account of one officer's behavior, which the speaker describes as exceptional by contrasting it with less respectful treatment by other officers:

> (Officer name) just stood out on the street. He'd pull up and he'd get out of the car and just, you know, talk to you. He would offer you a cigarette if you didn't have one. He would just stand and, like, talk to you. He wouldn't like, "Spread your feet, let me see, you ain't got no dope on you?" He would stop and talk and converse with you. You know, "hey, how you doin' today?" You know, "what's been goin' on? I mean, I know you're not going to tell me but I know what you're doin'. I just want to make sure, you know, that you're safe. And, do you really understand what you're getting yourself into here? I know that everybody is goin' through their own thing." He would talk to you like that.

Other women described instances in which officers sought them out to tell them that family members were searching for them, or that loved ones had enquired about them at the police station. Women who recounted such examples framed them as instances of real humanity on the part of officers, and occasionally cited these moments as pivotal in making what they regarded as major positive changes to their lives, such as making the decision to enter a drug rehabilitation program or to contact estranged family members. In such instances, respectful, kind treatment by an officer often achieved what arrest alone could not.

Discussion

This paper identified three beliefs that capture the complexities and inconsistencies of the women's interactions with police: arrest is indiscriminate, certain skills reduce likelihood or frequency of arrest, and police may chose to inflict abuse with relative impunity. These beliefs are part of a cultural system that reflects street-based sex work's inseparability from the drug economy, such that crack-dependent women engaged in street-based sex work share much in common with other street-involved actors. Indeed, these findings build upon previous research suggesting that street-based sex work and problematic substance use constitute a process of "trapping," whereby the nexus of homelessness, addiction, street-based sex work, and associated criminal records makes it difficult for women to make desired changes in their lives (Cusick and Hickman 2005). Policing, as well as broader experiences with the criminal justice system, clearly contributes to women's sense of being powerless to make such desired changes.

Arbitrary Nature of Arrest

Cultural norms identified among research participants include a fundamental belief that arrest is arbitrary and occurs in an environment where patrol officers' powers appear unchecked and disproportionately focused upon street-based sex workers. However, police occupational norms and legal mandates, such as probable cause, ensure that arrest is not arbitrary; officers simply cannot arrest whomever they like. Arrest results from interactions in what police call a "known prostitution area" where police actions are required to conform to internal policies and criminal law mandates, which, in turn, do not include access to this knowledge for street-based sex workers.

Women's experiences of their unpredictable, potentially violent work environment coupled with what they perceive as gender profiling contributes to the sense that the police may make an arrest whenever they like.

Women describe their work environment as a space where the threat of physical or other forms of violence and harm are ever-present in multiple guises, including clients, police, and other women. Gender renders all women potential targets if they are on the street in a "known prostitution area." Many street-based sex workers who work in such areas throughout the world face state efforts reliant upon discourses of containment and cleansing to regulate their activities. (Huey and Kemple 2007; O'Neill et al. 2008; Ross 2010). Women resent that their gendered presence invokes police surveillance, and, at a more abstract level, resent this forcible integration of behavior with identity that takes place through officers' presumed lack of distinction between their sex work (or drug-using) behaviors and their full personhood through a set of universalizing assumptions about street-based sex workers.

Street-based sex work involves often unpredictable social interactions, sometimes with unknown persons, and women accordingly describe their income generation strategies as a process that unfolds throughout the day. These could include an opportunity to steal after a potential client discloses that he is carrying cash, hence shifting a woman's focus from money for sex to obtaining the client's wallet and a windfall that pays for crack and motel housing for herself and her friends. The work environment is characterized by rather dramatic shifts that may occur in a woman's fortunes throughout the day; sometimes this can include arrest.

Women's sense of an all-inclusive police authority is clearly present as they recount what officers have told them prior to arrest. It seems clear that women have both a street-wise grasp of what the police legally can or cannot do in an encounter and little understanding of particular lawful behaviors that could inhibit an arrest and make prosecution more difficult, for example refusing to consent to a search of her bag or person, and asking for the officer's probable cause. This ambiguity contributes to their sense that the police have unlimited authority to arrest.

The cultural norms inherent in a street-based survival are unpredictable, leading to decision-making processes essentially dissimilar from those who design and implement police procedure. For instance, a "reasonable person" in this cultural context would absolutely get into a stranger's car, or not know the last name of a co-worker. These are behaviors that lead to the types of questions police use to determine if a woman is engaged in sex work, and yet they also constitute a normative practice in the street environment. Women's experience of engaging in practices deemed non-normative further contributes to their sense of arbitrary arrest, as well as to state practices that label them "risky" and in need of regulation by both the criminal justice and social services systems (Pollack 2010; Pollack 2005).

Strategies for Arrest Avoidance

Street-based sex workers face high stakes with respect to arrest because of the frequency with which they may receive jail sentences that some women reported extended up to 1 year or sentencing alternatives such as mandatory drug or other therapeutic treatment. In both venues, but particularly in the latter, women must "work on" examining traumatic life events that supposedly led to their engagement in street-based sex work (Peiss 2005; Shdaimah and Wiechelt 2012). They often must do so in a group setting, sometimes with women they have previously worked with on the street, thus displaying vulnerabilities that may harm them when they return, as many do, to their work environment. This is even more notable given that mental (and other) healthcare is often inaccessible to women upon exit from court-mandated or incarceration-related programming (Sered and Norton-Hawk 2013; Sered and Norton-Hawk 2008).

Scholars of therapeutic governance, as such court-mandated practices are known in the literature, argue that institutions produce particular subjectivity-related discourses that are dependent upon the management, control, and self-surveillance of certain groups of women within institutional settings (Hackett 2013). Many women find the risks of street-based sex work, and accompanying police surveillance, highly preferable to engaging in group-mandated discourse that positions them as vulnerable subjects. Previous research has suggested that US women engaged in street-based sex work use story-telling as a community risk reduction strategy in which women share tales of extreme violence as a means to educate one another about how to avoid particular clients or situations (Roche et al. 2005). Such stories often involve great courage on the part of the speaker, thus enhancing their street reputation; group discourse in court-mandated programs, conversely, stresses women's vulnerabilities.

Thus, women develop their arrest avoidance strategies directly in response to a high stakes work environment in which women must rely upon intuitive skills, such as being able to determine a person's intentions or inner state from linguistic and behavioral cues. All work environments necessitate the development of interpersonal skills that allow individuals to assess others' true motivations, particularly when full transparency about motives is undesirable. In the street environment, a mistake could mean arrest, violent victimization, or both. Women base their arrest avoidance strategies primarily upon their direct involvement with the criminal justice system, especially their experiences in court and with public defenders, who often must explain complex charges in the context of limited time and a heavy caseload. However, women also actively draw upon street-disseminated knowledge shared by other women about their own individual experiences with the criminal justice system as part of a body

of community knowledge that is, at best, partial and incomplete. This helps to explain the frequency with which women interviewed used highly specialized legal terms, such as "entrapment" or "furthering," to describe their experiences and lives in ways that do not actually apply to- or are practiced in the criminal justice system.

However, such a phenomenon, in which individuals do not fully understand the charges against them or the means by which a court convicted them of particular crimes, is part of a process of mystification, defined as legal and social processes either designed to or resulting in a full or partial obscuring of particular practices. This is akin to, but not exactly like, what Marx (1887) articulated as capital's mystificatory ability to reify workers' alienation from their labor. The street environment, with its drug informants, undercover police, and various forms of interpersonal intrigue, lends itself to interpersonal mystification, in which what one person says and understands to be true may be completely different from the other person in the situation.

For example, a woman described police arresting her while ignoring another sex worker's flamboyant street appearance, failing to note that the other sex worker could be a police informant or a target who law enforcement agents plan to follow with the goal of locating suspects involved in prostitution or drug activity at a higher level. Even with only a cursory understanding of how public order crimes like street prostitution are prevented through law enforcement, women envision themselves as active agents in this work environment and have multiple approaches for avoiding or confronting arrest. Hence women actively work to demystify the everyday sociopolitical and legal realities that impact their lives in destructive ways.

Abuse of Power by Police

Three cultural norms produce and reinforce women's beliefs that police can abuse their powers and operate with relative impunity. First is the belief in a 'cop mentality', second is the acknowledgment that police have the power to cause life-changing harm, or act with impunity, and third is the unknown scope of police powers. A related cultural belief stems from women's knowledge, gained from their own as well as other women's gendered life experiences and observations, that police have the power to cause life-changing harm. Arrest, particularly when coupled with a subsequent conviction, can have enormously destructive results for women, including long-term exclusion from housing, social services, and child custody, just to name a few.

Criminalization and stigma actively discourage women from reporting instances of criminal victimization in any form, but particularly from police. A prostitution arrest has the power to cause long-term exclusion from housing, social benefits, and child custody. Interview participants reported instances of police abusing their power in Denver, surrounding counties, and cities where they had previously worked. They described searches without cause, false charges being levied against women with prior prostitution arrests, and excessive physical force or sexual contact during or following an arrest. Some women also explained that they were actively discouraged from reporting a crime against their person like physical or sexual assault. Some women were angry at this unfairness and believed that police should be held equally accountable to all individuals, particularly concerning reports of violent or suspicious clients. Street-based sex workers' report feeling that a statement to police about their own victimization would place them under suspicion or they would be disregarded out of hand.

Perhaps the most positive findings in this study indicate that a number of street-based sex workers, despite their involvement in criminalized activities, describe patrol officers as individuals who are just doing a job. This presents potential for encouraging reporting and reducing stigma. Despite their involvement in criminalized activities, a number of women described police as restricted by their work-related responsibilities to arrest individuals committing crimes. Some women described police as just doing a job, and arresting street-based sex workers is part of that job, while some even said police can occasionally be helping agents or providers of useful life advice. However, when women described police officers as community members, they did so in terms that necessitated their own systematic exclusion, through arrest, searches, and surveillance, from that same community. This is part of broader patterns in which criminalized women face entrapment in a broader exclusionary system reliant upon their positioning as disruptive agents in need of state control (McNaughton and Sanders 2007; Sanchez 2004).

Documenting women's beliefs about police impunity provides important insights into the sophisticated means by which they actively resist what they describe as the oppressive realities framing their lives as individuals engaged in illegal income-generating behaviors. The cultural beliefs that shape the women's responses to an essentially hostile neighborhood environment, notably, exist in direct opposition to legal and professional requirements mandating that police treat all community members with respect and follow procedures that do not unfairly discriminate against particular individuals. However, police officers themselves, as demonstrated in women's neutral or positive accounts of their encounters with them, may also struggle with the complexities of work that often requires them to make rapid assessments of an individual's intentions and act accordingly, sometimes in potentially life-destroying ways.

Conclusions

Findings presented here call for the placement of women's experiences at the center of policy analysis, formation, and service provision that accounts for the complex realities of

their lives. This necessitates an understanding of how this cultural environment both produces, and results from, particular normative practices that, in turn, reflect deeper gendered realities. Addressing this belief system directly might impact policy and practice in the design outreach and residential programming for this unique community of women.

First and foremost, policymakers need to support services providers in their efforts to foster a nonjudgmental, safe environment that encourages women to share work-related knowledge with one another. Women's isolation from one another, due to concerns about arrest, and from services providers due to stigma, further traps them in a cycle that renders them vulnerable to abuse. A criminalized environment directly produces mystification among most parties implicated in it, such that women must be able to demystify the everyday sociopolitical realities that impact their lives in destructive ways, and encouraging the sharing of work-related knowledge is a powerful vehicle by which this might be accomplished.

Services providers, with support from policymakers, could consider developing interventions that could further demystify the legal and policing environment for women, such as programs that could help to reconcile incongruences between street-based sex workers' beliefs and actual policing practices. In this vein, helping women to understand *how* the sociolegal environment and the stigma of feminized sex-work intersects with gender, class, and racial bias could influence their own individual choices to engage in particular behaviors, could potentially be empowering to some women. Likewise, programming for street-based sex workers could be revised to include interventions that promote their constitutional rights as full citizens entitled to equal protection under the law when confronted with patrol officers since many women reported feelings of powerlessness.

Findings presented here suggest that policymakers and practitioners have much work to do in terms of mitigating street-based sex workers' understandings of the law as arbitrary and capricious. Until services providers are able to undertake that work with the support of policymakers, as one woman concisely noted on the unpredictability of her involvement within the criminal justice system, "it depends on the cop."

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