

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	Criminal No. 23cr10039
v.)	
)	Violation:
JOHN SULLIVAN,)	<u>Count One</u> : Hate Crime Acts
)	(18 U.S.C. § 249(a)(1))
Defendant)	

INDICTMENT

COUNT ONE
Hate Crime Acts
(18 U.S.C. § 249(a)(1))

The Grand Jury charges:

On or about December 2, 2022, in Quincy, in the District of Massachusetts, the defendant,

JOHN SULLIVAN,

willfully caused bodily injury to G.N., and attempted to cause bodily injury to G.N. through the use of a dangerous weapon, to wit, a vehicle, because of G.N.'s actual and perceived race and national origin.

All in violation of Title 18, United States Code, Section 249(a)(1).

A TRUE BILL


FOREPERSON



TOREY B. CUMMINGS
ASSISTANT U.S. ATTORNEY
DISTRICT OF MASSACHUSETTS

TARA ALLISON
TRIAL ATTORNEY
CIVIL RIGHTS DIVISION

District of Massachusetts: February 15, 2023
Returned into the District Court by the Grand Jurors and filed.

/s/ Noreen A. Russo

DEPUTY CLERK

at 2:29 PM

Criminal Case Cover Sheet

U.S. District Court - District of Massachusetts

Place of Offense: _____ Category No. II Investigating Agency FBI

City Quincy

Related Case Information:

County Norfolk

Superseding Ind./ Inf. _____ Case No. _____
Same Defendant _____ New Defendant _____
Magistrate Judge Case Number _____
Search Warrant Case Number _____
R 20/R 40 from District of _____

Defendant Information:

Defendant Name John Sullivan Juvenile: Yes No

Is this person an attorney and/or a member of any state/federal bar: Yes No

Alias Name _____

Address (City & State) 125 GRANITE ST APT 424, QUINCY, MA 02169

Birth date (Yr only): 1945 SSN (last4#): 3923 Sex M Race: Caucasian Nationality: USA

Defense Counsel if known: Patrick Donovan Address 234 Copeland St Suite 230

Bar Number _____ Quincy, MA 02169

U.S. Attorney Information:

AUSA Torey B. Cummings Bar Number if applicable 664549

Interpreter: Yes No List language and/or dialect: _____

Victims: Yes No If yes, are there multiple crime victims under 18 USC§3771(d)(2) Yes No

Matter to be SEALED: Yes No

Warrant Requested Regular Process In Custody

Location Status:

Arrest Date 12/02/2022

Already in Federal Custody as of _____ in _____

Already in State Custody at _____ Serving Sentence Awaiting Trial

On Pretrial Release: Ordered by: Norfolk County on 12/08/2022

Charging Document: Complaint Information Indictment

Total # of Counts: Petty _____ Misdemeanor _____ Felony 1

Continue on Page 2 for Entry of U.S.C. Citations

I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: 02/15/2023

Signature of AUSA:

TOREY CUMMINGS

Digitally signed by TOREY CUMMINGS
Date: 2023.02.14 15:30:11 -05'00'

District Court Case Number (To be filled in by deputy clerk): _____

Name of Defendant John Sullivan

U.S.C. Citations

	<u>Index Key/Code</u>	<u>Description of Offense Charged</u>	<u>Count Numbers</u>
Set 1	<u>18 U.S.C. § 249</u>	<u>Hate Crime Acts</u>	<u>1</u>
Set 2	_____	_____	_____
Set 3	_____	_____	_____
Set 4	_____	_____	_____
Set 5	_____	_____	_____
Set 6	_____	_____	_____
Set 7	_____	_____	_____
Set 8	_____	_____	_____
Set 9	_____	_____	_____
Set 10	_____	_____	_____
Set 11	_____	_____	_____
Set 12	_____	_____	_____
Set 13	_____	_____	_____
Set 14	_____	_____	_____
Set 15	_____	_____	_____

ADDITIONAL INFORMATION: _____

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOHN SULLIVAN,

Defendant.

CRIMINAL NO. 23cr10039

CERTIFICATION OF THE ASSISTANT ATTORNEY GENERAL

I, Kristen M. Clarke, hereby certify that in my judgment, prosecution by the United States of JOHN SULLIVAN, for violating Title 18, United States Code, § 249(a), on December 2, 2022, is in the public interest and is necessary to secure substantial justice. This certification is made pursuant to Title 18, United States Code, § 249(b).

Signed this 13th day of Feb., 2023



Kristen M. Clarke
Assistant Attorney General
Civil Rights Division