

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BAILLIE RACHELLE DICKENSON,
a.k.a. BAILLIE HANNAH
[DOB: 07/28/1990],

Defendant.

Case No.

COUNTS ONE AND TWO:

Assault Resulting in Serious Bodily Injury

18 U.S.C. § 113(a)(6)

NLT: None

NMT: 10 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 3 Years

Class C Felony

COUNTS THREE AND FOUR:

Obstruction of Justice

18 U.S.C. § 1512(b)(1), (c)(1)

NLT: None

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 3 Years

Class C Felony

COUNTS FIVE AND SIX

False Statement to a Federal Officer

18 U.S.C. § 1001

NLT: None

NMT: 5 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 3 Years

Class D Felony

\$600 Mandatory Special Assessment

SECRET INDICTMENT

THE GRAND JURY CHARGES THAT:

GENERAL ALLEGATIONS

1. Between on or about December 1, 2015, and on or about August 1, 2016, the defendant, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH**, was accompanying the Armed Forces outside the United States, as defined in Title 18, United States Code, Section 3267(2), that is:

- a. **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH**
was a dependent of a member of the Armed Forces;
- b. **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH**
was residing with a member of the Armed Forces; and
- c. **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH**
was not a national of or ordinarily resident in the Federal Republic of
Germany.

2. The conduct alleged in this Indictment occurred in or near Kaiserslautern in the Federal Republic of Germany.

3. The conduct alleged in Counts One through Six of this Indictment constitute offenses punishable by imprisonment for more than one year if the conduct had been engaged in within the special maritime and territorial jurisdiction of the United States.

4. The conduct alleged in this Indictment occurred outside the jurisdiction of any particular State or District and within the venue of the United States District Court for the Western District of Missouri, in that the last known residence of **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH** is Peculiar, Missouri, as provided by Title 18, United States Code, Section 3238.

COUNT ONE

(Assault resulting in serious bodily injury)

5. The General Allegations set forth in Paragraphs 1 through 4 of this Indictment are re-alleged and expressly incorporated herein as if set out in full.

6. On or about March 12, 2016, the defendant, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH**, did assault minor child D.D. and cause serious bodily injury to minor child D.D., in violation of Title 18, United States Code, Section 113(a)(4).

COUNT TWO

(Assault resulting in serious bodily injury)

7. The General Allegations set forth in Paragraphs 1 through 4 of this Indictment are re-alleged and expressly incorporated herein as if set out in full.

8. On or between February 19, 2016, and March 11, 2016, the defendant, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH**, did assault minor child D.D. and cause serious bodily injury to minor child D.D., in violation of Title 18, United States Code, Section 113(a)(4).

COUNT THREE

(Obstruction of Justice)

9. The General Allegations set forth in Paragraphs 1 through 4 of this Indictment are re-alleged and expressly incorporated herein as if set out in full.

10. On or between May 3, 2016, and June 24, 2016, the defendant, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH**, did knowingly intimidate, threaten, and corruptly persuade Derreck Dickenson with the intent to influence the testimony of Derreck Dickenson in an official proceeding relating to commission of a federal offense, to wit: the investigation by the United States Army Criminal Investigation Command into the injuries to minor child D.D. in February and March 2016, in violation of Title 18, United States Code, Section 1512(b)(1).

COUNT FOUR

(Obstruction of Justice)

11. The General Allegations set forth in Paragraphs 1 through 4 of this Indictment are re-alleged and expressly incorporated herein as if set out in full.

12. On or about May 21, 2016, the defendant, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH**, did corruptly conceal her cell phone with the intent to impair its integrity and availability for use in an official proceeding relating to commission of a federal offense, to wit: the investigation by the United States Army Criminal Investigation Command into the injuries to minor child D.D. in February and March 2016, in violation of Title 18, United States Code, Section 1512(c)(1).

COUNT FIVE
(False Statement)

13. The General Allegations set forth in Paragraphs 1 through 4 of this Indictment are re-alleged and expressly incorporated herein as if set out in full.

14. On or about March 14, 2016, the defendant, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH** did willfully and knowingly make a materially false, fictitious, fraudulent statement and representation in a matter within the jurisdiction of a department and agency of the United States, specifically, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH** stated, in substance and in part, to a Special Agent of the United States Army Criminal Investigative Command investigating the injuries to minor child D.D., that before bringing D.D. to the hospital on March 12, 2016, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH** put an elder child to sleep on a couch in the living room of their home, and put D.D. to sleep in a bouncer chair on the floor near the couch, after which she left the room. Sometime later, she heard the elder child cry out and entered the living room, at which point she saw that the elder child was on top of D.D. with the elder's child feet on D.D.'s chest.

15. The statement and representation was false because, as **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH** then and there knew, before bringing D.D. to the hospital on March 12, 2016, she did not put the elder child or D.D. to sleep on the couch or in a bouncer chair in the living room, she did not hear the elder child cry out causing her to enter the living room, and she did not see an elder child on top of D.D. with the elder child's feet on D.D.'s chest.

COUNT SIX
(False Statement)

16. The General Allegations set forth in Paragraphs 1 through 4 of this Indictment are re-alleged and expressly incorporated herein as if set out in full.

17. On or about March 14, 2016, **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH** did willfully and knowingly make a materially false, fictitious, fraudulent statement and representation in a matter within the jurisdiction of a department and agency of the United States, specifically **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH** stated, in substance and in part, to a Special Agent of the United States Army Criminal Investigative Command investigating the injuries to minor child D.D., that D.D.'s lack of movement on his right side was due to the fact that D.D. laid on his right side more in utero, which caused D.D.'s motor skills not to develop as well as on his right side, and that the family did physical activity and exercises with D.D. at home to increase his right-side motor skills.

18. The statement and representation was false because, as **BAILLIE RACHELLE DICKENSON A.K.A. BAILLIE HANNAH** then and there knew, prior to being presented to the hospital on March 12, 2016, D.D. had not exhibited any right-side injury or weakness, and

the family did not do physical activity and exercise with D.D. at home to increase his right-side motor skills.

A TRUE BILL.

/s/ Kathryn Varnon
FOREPERSON OF THE GRAND JURY

/s/ Teresa Moore
Teresa Moore
Assistant United States Attorney

/s/ Mona Sahaf
Mona Sahaf
Trial Attorney, Criminal Division,
Human Rights and Special Prosecutions

Dated: 12/11/18
Kansas City, Missouri