AUSA: Cunningham

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of Maryland

United States of America v. GIOVONNI Z. POPE *Defendant(s)*	)))))))	Case No. 1:21-mj-342 TMD

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 31, 2021 in the county of _____ in the jurisdiction and venue of the District of Maryland, the defendant(s) violated:

Code Section	*Offense Description*
18 U.S.C. § 1111 18 U.S.C. § 3261(a)(1)	Murder while employed by or accompanying the Armed Forces outside the United States

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated by reference herein.

☑ Continued on the attached sheet.

Traci Batla

Complainant's signature

Traci Batla, Special Agent, NCIS

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: 2/9/2021

Judge's signature

City and state: Baltimore, Maryland

Thomas M. DiGirolamo, U.S. Magistrate Judge

Printed name and title

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA	)	
	)	
v.	)	1:21-mj-342 TMD
	)	
GIOVONNI POPE,	)	
	)	
Defendant.	)	

AFFIDAVIT IN SUPPORT OF APPLICATION FOR
CRIMINAL COMPLAINT AND ARREST WARRANT

I, Traci Batla, Special Agent of the Naval Criminal Investigative Service (NCIS), being duly sworn, depose and state the following:

I. Introduction

1. I am a Special Agent with NCIS (Naval Criminal Investigative Service) and have been so employed since April 2018. I am currently assigned to the General Crimes Squad at the NCIS Middle East Field Office. I am a graduate of the Federal Law Enforcement Training Center (FLETC) Criminal Investigator Training Program (CITP), the NCIS Special Agent Basic Training Program (SABTP), NCIS Adult Sexual Assault Investigations Training Program (AASAITP), and Digital Photography for Law Enforcement (DPLE) Level II. Prior to my employment with NCIS, from January 2011 to April 2018, I was employed as Policy Analyst and then as the Deputy Director for Latin America and Caribbean Affairs with the U.S. Department of Homeland Security (DHS). I have a M.A. in International Affairs from American University and a B.A. in International Studies from Virginia Polytechnic Institute and State University. As part of my daily duties as an NCIS Special Agent, I am authorized to conduct investigations for offenses enumerated in Title 18, United States Code, and Title 10, United States Code, also known as the Uniform Code of Military Justice (UCMJ), which affect

the Department of the Navy, and specifically the United States Navy and United States Marine Corps. I investigate criminal violations and have participated in numerous cases involving and relating to death, sexual assault, domestic violence, assault, and narcotics.

2. I have not included every fact I know about GIOVONNI POPE and his illegal activities in this affidavit; rather, I have included those facts I believe are needed to demonstrate probable cause for the warrant I seek. The information in this affidavit is based on my personal knowledge and observations, on information conveyed to me by other law enforcement officials, and on my review of records, documents, and other physical evidence relevant to their activities.

A. Pertinent Statutes

3. I submit this Affidavit in support of a criminal complaint charging POPE, an adult U.S. citizen, with murder, in violation of Title 18, United States Code, Section 1111, while employed by or accompanying the Armed Forces outside the United States, in violation of Title 18, United States Code, Section 3261(a)(1)).

B. Jurisdiction

4. On January 31, 2021, E.A., the victim, was employed as a civilian Department of Defense (DOD) employee stationed at the Naval Support Activity (NSA), Bahrain. E.A.'s tour in the Kingdom of Bahrain ("Bahrain") began on September 17, 2017. On August 21, 2019, and again on September 24, 2019, E.A.'s son, GIOVONNI Z. POPE, was issued a visitor badge for access to the NSA Bahrain Base. On August 9, 2020, the Commander of U.S. Naval Forces Central Command approved the request for POPE to join E.A. in Bahrain as her dependent. On September 13, 2020, the Commanding Officer of NSA Bahrain approved the request for command sponsorship of POPE as E.A.'s dependent, entitling him to base sponsorship for a multi-entry visa

to Bahrain. Subsequently, on September 20, 2020, POPE was issued a civil service (family member) badge for NSA Bahrain that expires on March 17, 2022.

5. Accordingly, on January 31, 2021, POPE was the dependent of a civilian employee of the Department of Defense pursuant to Title 18, United States Code, Sections 3261(a)(1) and 3267(2)(A)(ii). Further, POPE was present or residing in Bahrain, and was not a national of or ordinarily resident in Bahrain.

6. POPE resided in the same residence as E.A. at Kazerooni Heights-1, Building 2030, Road 5717, Block 0257, Flat#171, Seventeenth Floor, Amwaj, Bahrain. Building tenants, including NCIS Special Agents who reside on the same floor, confirmed that E.A. and POPE lived in the same residence. Accordingly, on January 31, 2021, POPE resided with a civilian employee of the Department of Defense pursuant to Title 18, United States Code, Sections 3261(a)(1) and 3267(2)(B) and was not a national of or ordinarily resident in Bahrain.

8. POPE's acts, described in this affidavit, constitute offenses that are punishable by imprisonment for more than one year if engaged in within the special maritime and territorial jurisdiction of the United States.

C. Venue

9. Pursuant to Title 18, United States Code, Section 3238, venue for the offense described herein lies in the District of Maryland, as the defendant will be first brought to the District of Maryland.

II. Probable Cause and Details of the Investigation

10. On the morning of February 1, 2021, one or more of E.A.'s co-workers at the Naval Computer and Telecommunications Station (NCTS) observed that E.A. was not present at work for her scheduled shift. Her coworkers attempted to contact her on her mobile telephone but

received no reply. One of her colleagues, a civilian employed with DOD, drove to E.A.'s residence at Kazerooni Heights-1, Building 2030, Road 5717, Block 0257, Flat#171, Seventeenth floor, Amwaj Islands, Bahrain (the Residence) to check on E.A. However, no one answered the door.

11. Concerned about E.A.'s welfare, her work colleague and the Property Manager for the Residence opened the door to the Residence. Upon opening the door, E.A.'s colleague and the Property Manager noticed a sheet or blanket covering what appeared to be a body near the entrance of the Residence.

12. Shortly thereafter, at approximately 12:15 PM, NCIS Supervisory Special Agent (SSA) Amy Grabowski and Special Agent (SA) Courtney Walston arrived at the Residence. SA Walston and SSA Grabowski observed through the door what appeared to be a body under a gray sheet or blanket inside the Residence. SA Walston and SSA Grabowski also observed what appeared to be blood on the floor tile next to the blanket and on the wall adjacent to the door frame of the main entrance to the Residence.

13. Subsequently, Bahraini emergency services responded to the Residence. Upon entry, Emergency Medical Technicians (EMTs) removed the gray covering from the body. When medical personnel removed the covering from the top portion of E.A.'s body, SA Walston and SSA Grabowski observed a black female with multiple wounds to the left side of her neck, left shoulder, left arm, and observed blood under the hair of her head. E.A. was wearing only a bra, underwear, and socks. No occupants were present inside the Residence with E.A. at that time. The EMTs proceeded to pronounce E.A. deceased at approximately 12:40 PM. The Bahraini authorities took a photograph of E.A.'s face, and E.A.'s work colleague who was at the scene viewed the photograph and positively identified E.A.

14. A building employee reviewed the building's security cameras. The electronic recordings showed POPE leaving the building at approximately 9:13 PM on January 31, 2021, in E.A.'s silver Ford Sport Utility Vehicle bearing Bahrain plates 168754. The Bahrain Ministry of Interior (MOI) immediately assumed primary jurisdiction over the investigation and subsequently apprehended POPE in E.A.'s vehicle. NCIS was informed that at the time he was apprehended, POPE was wearing blood-stained clothing and had minor injuries to his hands. POPE was subsequently detained by MOI as a suspect in E.A.'s apparent murder and is being held by local law enforcement in Manama, Bahrain.

15. On February 1, 2021, the Bahrain MOI Criminal Investigations Directorate (CID) conducted a recorded interview of POPE. NCIS SA Affiant Traci Batla and SSA Grabowski were permitted to sit outside of the interview room next to the open interview room door and listen to the interrogation solely as observers. POPE stated that on January 31, 2021, he was at home at the Residence when E.A. returned from work. Soon after returning home, POPE said E.A. declared she was dissatisfied at work and requested POPE kill her. POPE stated that he retrieved a red knife from the kitchen and stabbed E.A. eighteen times. After stabbing E.A., POPE said he washed the knife and left it in the kitchen sink. He said he also removed E.A.'s sweater, put it in a plastic bag, and threw the sweater down the garbage chute in the apartment building. He said that he then cleaned up the apartment, which he estimated took between thirty and sixty minutes. POPE said that after he killed E.A., he used her credit card to purchase an airplane ticket for a flight on February 2, 2021, to the United States, to visit his girlfriend in California. POPE also told investigators he is currently taking the medication Zyprexa.[1]

[1] Zyprexa is used for the treatment of schizophrenia and for manic or mixed episodes of bipolar I disorder.

16. On February 2, 2021, POPE made another statement to Bahrain CID investigators, which was also electronically recorded. NCIS Special agents were not present during this statement, but I have seen a video recording of the statement and reviewed a written report by Bahrain CID. In this statement, POPE stated that during the day on January 31, 2021, he was thinking about how his mother was blocking him from achieving his goals by not letting him return to the United States to work on his clothing business. POPE stated that his solution to his problems was to kill his mother. POPE stated that when his mother returned home from work, he went to the kitchen and got a red knife with a white stripe on the blade and then went to the living room where his mother was sitting and stabbed her 18 times. He also stated that he accidentally injured his own wrist when his mother's arm deflected one of his stabs.

17. During my investigation, I reviewed crime scene photos taken by Bahrain CID. These photos show a large red kitchen knife with other dishes in the kitchen sink of the apartment. In addition, the photos depict E.A., lying on her back in the living room with numerous wounds visible on her body. The photos also depict what appear to be traces of blood on various surfaces in the residence, including on the wall beside the door, on the floor near the body in the living room, on the kitchen floor, on a light switch, and in the bathroom.

18. On February 1, 2021, NCIS SA Kenneth Harris and SA Brent Howlett attended the autopsy of E.A. at Salmaniya Medical Complex, Road 2904, Manama, Bahrain. A Medical Legal Doctor Examiner performed the autopsy of E.A. SA Harris and SA Howlett were permitted to observe the autopsy from outside the autopsy room through the windows. They observed what appeared to be multiple lacerations to E.A.'s neck, chest, legs, hands and back. The doctor stated E.A. had multiple defensive wounds on her arms and hands and that there were multiple lacerations to her vital organs.

19. Presently, POPE is being held under the authority of the Bahrain public prosecutor for the purpose of continued investigation. He is not currently being prosecuted in Bahrain. The Government of Bahrain has provided assurances that if the United States seeks to prosecute POPE, Bahrain will cease its investigation and not pursue a prosecution against POPE.

IV. Conclusion

20. Based upon the facts set forth above, I respectfully submit there is probable cause to find that, on or about January 31, 2021, POPE murdered E.A., in violation Title 18, United States Code, Sections 1111 and 3261(a).

Traci Batla

Traci Batla
Special Agent
Naval Criminal Investigative Service

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) this 9 day of February, 2021.

Thomas M. DiGirolamo
United States Magistrate Judge