

DC SUPERIOR COURT  
CRIMINAL INTAKE

SUPERIOR COURT

OF THE

2018 MAY -1 PM 4: 41

DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on March 19, 2018

THE UNITED STATES OF AMERICA

Criminal No:

2018 CF1 006590  
~~GJO~~

v.

JOHN DOE,  
with the following DNA profile:

TPOX: 8, 11  
CSF1PO: 10, 12  
D3S1358: 12, 16  
FGA: 19, 23  
vWA: 16, 18  
THO1: 7, 7  
D16S539: 11, 13  
D7S820: 10, 11  
D8S1179: 14, 14  
D21S11: 29, 30  
D18S51: 16, 21  
D5S818: 12, 13  
D13S317: 11, 13  
Amel: X, Y

PDID:  
DCTN: U18012746

Violations:

22 D.C. Code, Section 801(a);  
22 D.C. Code, Section 2001;  
22 D.C. Code, Section 1810;  
22 D.C. Code, Sections 3002(a)(1),  
3020(a)(3) and (a)(5);  
22 D.C. Code, Sections 2801, 2802;  
22 D.C. Code, Section 2801;  
22 D.C. Code, Section 404.01;  
22 D.C. Code, Sections 3002(a)(1),  
3020(a)(3) and (a)(5); 24 D.C. Code Section  
403.01(b-2)(2)(G)  
22 D.C. Code, Sections 2801, 3601;  
22 D.C. Code, Section 402 (2001 ed.)

(First Degree Burglary; Kidnapping;  
Threatening To Injure/Kidnap a Person; First  
Degree Sexual Abuse (Aggravating  
Circumstances); Attempt To Commit  
Robbery (Force and Violence); Robbery;  
Aggravated Assault [Create Grave Risk];  
Assault With Intent To Commit First Degree  
Sexual Abuse (Aggravating Circumstances);  
Robbery of a Senior Citizen; Assault with a  
Dangerous Weapon)

The Grand Jury charges:

Counts pertaining to victim L.G.

FIRST COUNT:

On or about May 11, 2003, within the District of Columbia, John Doe entered a guest room of the Renaissance Hotel, while L.G. was inside that guest room with the intent to assault L.G. (First Degree Burglary, in violation of 22 D.C. Code, Section 801(a) (2001 ed.))

SECOND COUNT:

On or about May 11, 2003, within the District of Columbia, John Doe seized, confined, kidnapped, abducted and carried away L.G., with the intent to hold and detain L.G., for the purpose of assaulting L.G. (Kidnapping, in violation of 22 D.C. Code, Section 2001 (2001 ed.))

THIRD COUNT:

On or about May 11, 2003, within the District of Columbia, John Doe threatened to injure and kidnap L.G. (Threatening To Injure/Kidnap a Person, in violation of 22 D.C. Code, Section 1810 (2001 ed.))

FOURTH COUNT:

On or about May 11, 2003, within the District of Columbia, John Doe engaged in a sexual act with L.G., that is, penetration of L.G.'s anus by John Doe's penis, by using force against L.G.

*The Grand Jury Further Charges* that at the time John Doe committed the offense of First Degree Sexual Abuse, L.G. sustained serious bodily injury as a result of the offense.

*The Grand Jury Further Charges* that John Doe is or has been found guilty of committing sex offenses against 2 or more victims.

(First Degree Sexual Abuse (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 3002(a)(1), 3020(a)(3) and (a)(5) (2001 ed.))

FIFTH COUNT:

On or about May 11, 2003, within the District of Columbia, John Doe engaged in a sexual act with L.G., that is, penetration of L.G.'s vulva by John Doe's penis, by using force against L.G.

*The Grand Jury Further Charges* that at the time John Doe committed the offense of First Degree Sexual Abuse, L.G. sustained serious bodily injury as a result of the offense.

*The Grand Jury Further Charges* that John Doe is or has been found guilty of committing sex offenses against 2 or more victims.

(First Degree Sexual Abuse (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 3002(a)(1), 3020(a)(3) and (a)(5) (2001 ed.))

SIXTH COUNT:

On or about May 11, 2003, within the District of Columbia, John Doe did attempt, by force and violence, against resistance and by putting in fear, to steal and take U.S. currency, from the person and from the immediate actual possession of L.G. (Attempt To Commit Robbery (Force and Violence), in violation of 22 D.C. Code, Sections 2801, 2802 (2001 ed.))

SEVENTH COUNT:

On or about May 11, 2003, within the District of Columbia, John Doe, by force and violence, against resistance and by putting in fear, stole and took from the person and from the immediate actual possession of L.G., property of value belonging to L.G. consisting of a necklace. (Robbery, in violation of 22 D.C. Code, Section 2801 (2001 ed.))

EIGHTH COUNT:

On or about May 11, 2003, within the District of Columbia, John Doe did by any means, knowingly and purposely cause serious bodily injury to L.G.; and under circumstances manifesting extreme indifference to human life, intentionally and knowingly engaged in conduct which created a grave risk of serious bodily injury to another and thereby caused serious bodily injury to L.G. (Aggravated Assault [Create Grave Risk], in violation of 22 D.C. Code, Section 404.01 (2001 ed.))

Counts pertaining to victim D.J.

NINTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe entered a guest room of the Jefferson Hotel, while D.J. was inside that guest room with the intent to assault D.J. (First Degree Burglary, in violation of 22 D.C. Code, Section 801(a) (2001 ed.))

TENTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe seized, confined, kidnapped, abducted and carried away D.J., with the intent to hold and detain D.J., for the purpose of assaulting D.J. (Kidnapping, in violation of 22 D.C. Code, Section 2001 (2001 ed.))

ELEVENTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe threatened to injure and kidnap D.J. (Threatening To Injure/Kidnap a Person, in violation of 22 D.C. Code, Section 1810 (2001 ed.))

TWELFTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe engaged in a sexual act with D.J., that is, penetration of D.J.'s vulva by John Doe's penis, by using force against D.J.

*The Grand Jury Further Charges* that at the time John Doe committed the offense of First Degree Sexual Abuse, D.J. sustained serious bodily injury as a result of the offense.

*The Grand Jury Further Charges* that John Doe is or has been found guilty of committing sex offenses against 2 or more victims.

*The Grand Jury Further Charges* that at the time John Doe committed the offense of First Degree Sexual Abuse, D.J. was more than 60 years old.

(First Degree Sexual Abuse (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 3002(a)(1), 3020(a)(3) and (a)(5); 24 D.C. Code Section 403.01(b-2)(2)(G) (2001 ed.))

THIRTEENTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe engaged in a sexual act with D.J., that is, penetration of D.J.'s anus by John Doe's penis, by using force against D.J.

*The Grand Jury Further Charges* that at the time John Doe committed the offense of First Degree Sexual Abuse, D.J. sustained serious bodily injury as a result of the offense.

*The Grand Jury Further Charges* that John Doe is or has been found guilty of committing sex offenses against 2 or more victims.

*The Grand Jury Further Charges* that at the time John Doe committed the offense of First

Degree Sexual Abuse, D.J. was more than 60 years old.

(First Degree Sexual Abuse (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 3002(a)(1), 3020(a)(3) and (a)(5); 24 D.C. Code Section 403.01(b-2)(2)(G) (2001 ed.))

FOURTEENTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe assaulted D.J. with the intent to engage in a sexual act with D.J., that is contact between D.J.'s mouth and John Doe's penis by using force against D.J.

*The Grand Jury Further Charges* that at the time John Doe committed the offense of Assault With Intent to Commit First Degree Sexual Abuse, D.J. sustained serious bodily injury as a result of the offense.

*The Grand Jury Further Charges* that John Doe is or has been found guilty of committing sex offenses against 2 or more victims.

(Assault With Intent To Commit First Degree Sexual Abuse (Aggravating Circumstances), in violation of 22 D.C. Code, Sections 401, 3002(a)(1), 3020(a)(3) and (a)(5) (2001 ed.))

FIFTEENTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe, by force and violence, against resistance and by putting in fear, stole and took from the person and from the immediate actual possession of D.J., a person sixty years of age or older, property of value belonging to D.J., consisting of U.S. currency. (Robbery of a Senior Citizen, in violation of 22 D.C. Code, Section 2801, 3601 (2001 ed.))

SIXTEENTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe assaulted D.J. with a dangerous weapon, that is, a glass shard. (Assault with a Dangerous Weapon, in violation of 22 D.C. Code, Section 402 (2001 ed.))


SEVENTEENTH COUNT:

On or about May 23, 2003, within the District of Columbia, John Doe did by any means, knowingly and purposely cause serious bodily injury to D.J.; and under circumstances manifesting extreme indifference to human life, intentionally and knowingly engaged in conduct which created a grave risk of serious bodily injury to another and thereby caused serious bodily injury to D.J. (Aggravated Assault [Create Grave Risk], in violation of 22 D.C. Code, Section 404.01 (2001 ed.))



JESSIE K. LIU  
United States Attorney  
in and for the District of Columbia

A TRUE BILL:



Foreperson