

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

Holding a Criminal Term
Grand Jury Sworn in on November 10, 2021

UNITED STATES OF AMERICA

v.

JOLY GERMINE,
also known as "Yonyon,"

Defendant.

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CRIMINAL NO.:

GRAND JURY ORIGINAL

VIOLATION:

18 U.S.C. § 1203(a)
(Conspiracy to Commit Hostage Taking)

Case: 1:22-cr-00161

Assigned to: Judge Bates, John D.

Assign Date: 5/10/2022

Description: INDICTMENT (B)

Related Case No: 21-cr-00699 (JDB)

INDICTMENT

The Grand Jury charges that:

GENERAL ALLEGATIONS

At all times material to this Indictment:

1. The Defendant, **JOLY GERMINE**, also known as "Yonyon," was a citizen and resident of Haiti. He was also a leader of the Haiti-based gang, 400 Mawozo.
2. On or about October 16, 2021, seventeen Christian missionaries, sixteen of whom were citizens of the United States, were kidnapped near Port au Prince, Haiti, including five children, one as young as eight months' old ("the Hostages").
3. On or about October 16, 2021, as part of their missionary organization's work, the Hostages took a van to visit a local orphanage outside of Port-au-Prince. While returning therefrom, armed men forced at gunpoint the group's van driver to stop and took control of the van. The armed men robbed the Hostages of their property and held the Hostages captive. The Hostages were not free to leave.

4. On or about October 16, 2021, a representative of the missionary organization received a phone call from an individual claiming to be a leader of the kidnappers. The individual stated that he had the Hostages and was holding them for ransom of \$1 million each. The individual told the representative stated that he would be in touch regarding next steps.

5. Beginning on or about October 18, 2021, the 400 Mawozo gang began taking credit for the kidnapping on social media and making publicly known the aforementioned ransom demand. Specifically, on or about October 22, 2021, a leader of 400 Mawozo appeared in a social media video and announced that the gang was holding the Hostages for ransom.

6. Two of the Hostages were released on or about November 20, 2021. Three of the Hostages were released on or about December 5, 2021. The remaining Hostages escaped from captivity on or about December 16, 2021.

7. During the time period of the Hostages' captivity, the Defendant, **JOLY GERMINE, also known as "Yonyon,"** directed other members of the 400 Mawozo gang, including other gang leaders, and asserted influence and control over the gang's operations. Specifically, the Defendant exercised control over portions of 400 Mawozo's kidnapping operations, to include the ransom negotiation for the release of the Hostages. One of the gang's stated goals in holding the Hostages captive was to secure from the Haitian government the Defendant's release from prison in Haiti. The Defendant was in regular contact with other 400 Mawozo leaders about the Hostages' kidnapping, captivity, and ransom.

COUNT ONE

8. Beginning as early as on or about October 16, 2021, and continuing at least through on or about December 16, 2021, within the country of Haiti and the extraterritorial jurisdiction of the United States and, pursuant to Title 18, United States Code, Section 3238, within the venue of

the United States District Court for the District of Columbia, defendant **JOLY GERMINE**, also known as “Yonyon,” did knowingly and intentionally conspire and agree with other persons known and unknown to the Grand Jury, to seize and detain and threaten to kill, to injure, and to continue to detain United States nationals, that is, Melodi Korver, Ryan Korver, Matthew Miller, Rachel Miller, Cassandra Noecker, Cheryl Noecker, Cherilyn Noecker, Austin Smucker, Samuel Stoltzfus, Westley Yoder, Katie Yoder, and minors B.N., A.K., L.K., C.N., and S.N., in order to compel a third person and a governmental organization to do and abstain from doing an act for the release of those individuals as an explicit and implicit condition for their release, that is, to pay ransom for the release of the Hostages and to secure from the Haitian government the Defendant’s release from prison in Haiti.

(Conspiring to Commit Hostage Taking, in violation of Title 18, United States Code, Section 1203(a)).

A TRUE BILL

FOREPERSON

Handwritten signature of Matthew M. Graver in cursive script.

Attorney of the United States in
and for the District of Columbia