

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

February 14, 2024
Ravi Subramanian, Clerk
By *[Signature]* Deputy

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WASHINGTON AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,

v.

MARCUS JEROME DOUGLAS,
Defendant.

NO. **CR 24 - 5043 TMC**

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Aggravated Sexual Abuse of a Minor)

Between in or about 2005 and in or about 2007, within the exterior boundaries of the Nisqually Indian Reservation, Indian Country as defined by Title 18, United States Code, Section 1151, and within Thurston County and the Western District of Washington, MARCUS JEROME DOUGLAS, an Indian, knowingly engaged in a sexual act, that is, contact between the penis and vulva, with Minor Victim 1, who had not attained the age of twelve years at the time of the sexual act.

All in violation of Title 18, United States Code, Sections 1153, 2241(c) and 2246(2)(A).

COUNT 2

(Abusive Sexual Contact)

Between in or about 2005 and in or about 2007, within the exterior boundaries of the Nisqually Indian Reservation, Indian Country as defined by Title 18, United States Code, Section 1151, and within Thurston County and the Western District of Washington, MARCUS JEROME DOUGLAS, an Indian, did knowingly engage in sexual contact, that is, intentional touching, directly and through the clothing, of the genitalia of Minor Victim 3, who had not attained the age of twelve years at the time of the sexual contact, without Minor Victim 3’s permission and with the intent to abuse, humiliate, harass, degrade and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Sections 1153, 2244(b), 2244(c), and 2246(3).

COUNT 3

(Aggravated Sexual Abuse of a Minor)

Between in or about 2002 and in or about 2006, within the exterior boundaries of the Nisqually Indian Reservation, Indian Country as defined by Title 18, United States Code, Section 1151, and within Thurston County and the Western District of Washington, MARCUS JEROME DOUGLAS, an Indian, did knowingly engage in a sexual act, that is, contact between the penis and mouth, with Minor Victim 4, who had not attained the age of twelve years at the time of the sexual act.

All in violation of Title 18, United States Code, Sections 1153, 2241(c) and 2246(2)(A).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 3 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of the offenses alleged in Counts 1 through 3 MARCUS JEROME DOUGLAS shall forfeit to the United States, pursuant to Title 18, United States Code,

1 Section 2253(a), all property used to commit or to facilitate commission of the offense
2 and any proceeds of the offense.

3 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
4 any act or omission of the defendant,

- 5 a. cannot be located upon the exercise of due diligence;
- 6 b. has been transferred or sold to, or deposited with, a third party;
- 7 c. has been placed beyond the jurisdiction of the Court;
- 8 d. has been substantially diminished in value; or,
- 9 e. has been commingled with other property which cannot be divided
10 without difficulty,

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendant, up to the value of the above-described forfeitable property, pursuant to
3 Title 21, United States Code, Section 853(p).

5 A TRUE BILL:

6 DATED: 2/14/23²¹⁰

7 *Signature of Foreperson redacted pursuant*
8 *to the policy of the Judicial Conference of*
9 *the United States.*

10 _____
11 FOREPERSON

11 
12 TESSA M. GORMAN
13 United States Attorney

14 
15 TODD GREENBERG
16 Assistant United States Attorney

17 
18 CECELIA GREGSON
19 Assistant United States Attorney

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21 KRISTINE FOERSTER
22 Assistant United States Attorney
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