

IN THE SUPERIOR COURT OF GUAM
DECLARATION

COMES NOW, LEONARDO M. RAPADAS, a duly appointed Assistant Attorney General, aver upon information and belief that the following declaration is true. I have reviewed Guam Police Report nos. 21-15506 and 21-18811 submitted by Guam Police Department ("GPD") Officers C. Taitano, J. Aguon and others that indicated the following occurred in Guam:

On or about June 28, 2021, at about 12:20 p.m., the officers responded to a harassment and stalking complaint at UNK Wholesale, a warehouse on Route 1 in Tamuning. The warehouse was in the same building as Goodyear Tires. When they arrived at the location, they spoke to [REDACTED] ("Victim"), who stated that she was being harassed and stalked by her ex-boyfriend identified as **ALBERT JEROME MANLEY ("DEFENDANT")**. They had been together for about nine year and shared a daughter together. She broke the relationship off with him about a week prior. The Victim and he lived in her apartment. She temporarily moved to her father's house to allow the **DEFENDANT** to gather his belongings. He showed up at the residence a couple days later and caused a disturbance. Police had to be called to remove him. Throughout the following week, she would received unwanted calls from him.

On the above date, in the morning, the Victim blocked the **DEFENDANT** from all calls and social media on her phone. He then began calling her at her work phone repeatedly. She told him to stop calling. At about 10:00 a.m., same date, he arrived at UNK Warehouse, her place of work. She told him to leave which he did, but he continued to call her. An employee reported to the officers she had answered some of those calls. She told the **DEFENDANT** that he was calling a business phone and to stop bothering the Victim. The officers could see that in an hour and a half period, the **DEFENDANT** had called 40 times. He kept calling despite her demands. While the officers had been interviewing the witness, they could see he was still calling the work phone. They were able to talk to the **DEFENDANT** to tell him to stop. They were not able to locate him at this time.

On or about August 5, 2021, at about 11:07 p.m., the officers responded to an assault complaint made by the Victim at the OS7 Market in Mangilao. She reported she wanted to end her relationship with the **DEFENDANT**. He did not. Earlier, same date, they had been running errands. They had also been arguing. She did not want him at her residence so they went to get his brother's truck to move his stuff. There was an issue with the truck battery and as they were headed back to the **DEFENDANT'S** brother's residence, she explained she did not want to be

with him because of the way he treats her. He responded by striking her on her throat area. The officers saw slight redness there. The **DEFENDANT** was not located at this time.


On or about September 6, 2021, at about 11:20 p.m. while on patrol, officers saw the a vehicle parked in the center lane on Route 4 by Peredo's Mart in Yona. They approached the vehicle and saw that the operator, identified as the **DEFENDANT**, was asleep at the wheel with the vehicle still in "Drive."

Based on the foregoing, there is probable cause to charge **ALBERT JEROME MANLEY** with:

1. **SIMPLE STALKING (As a Third Degree Felony)**, in violation of 9 GCA §§ 19.70(a) and (d);
2. **FAMILY VIOLENCE (As a Misdemeanor)**, in violation of 9 GCA §§ 30.10(a)(1), (b), and 30.20(a); and
3. **HARASSMENT (As a Petty Misdemeanor)**, in violation of 9 GCA §§ 61.20(a).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 8th day of September, 2021.



LEONARDO M. RAPADAS
Assistant Attorney General, *Prosecution Division*