

**IN THE SUPERIOR COURT OF GUAM
DECLARATION**

I, RICHELLE Y. CANTO, a duly appointed Assistant Attorney General, aver upon information and belief that the following declaration is true. I have reviewed Guam Police Department (GPD) Reports # 21-20811 submitted by Officer T. T. Walker and others, which revealed the following occurred in Guam:

On September 10, 2021, police conducted a traffic stop in which one of the passengers, **MARVIN KOUCH** ("DEFENDANT"), was a suspect to an assault case that occurred on or about August 17, 2021.

On or about August 17, 2021, at approximately 8:40 p.m., GPD officers responded to a female individual who was hiding at SJ Market in Tamuning from her boyfriend. Upon arrival, police met with [REDACTED] ("Victim") who stated her ex-boyfriend, **KOUCH** had assaulted and threatened her. She stated that earlier that day, Defendant showed up at her residence and began yelling at her. Victim then stated she decided to walk to SJ Market to call the police because she did not have a phone and that she tried to sneak her way to the store, but Defendant found her. Victim also stated that as she continued to walk towards SJ Market, Defendant threw three rocks at her, one of which hit her arm, pulled her hair, and pushed her. Victim further stated that Defendant, while holding an orange box cutter, told her that if she didn't follow him then he can really kill her. Victim stated that before entering SJ Market, Defendant punched her left cheek bone.

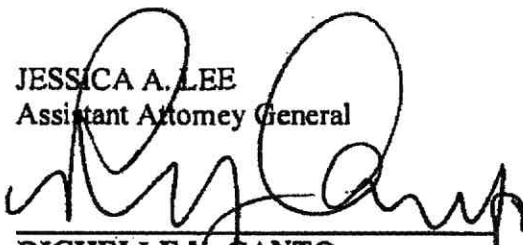
Victim reported she had been in a relationship with Defendant for about three months and that in the last week, Defendant had punched her in the face several times and also threatened to hurt her family.

Based on the foregoing, there is probable cause to charge **MARVIN KOUCH** with the following:

1. One (1) count of **FAMILY VIOLENCE** (as a Third Degree Felony), in violation of Title 9 G.C.A. § 30.10(a)(2) and 30.20(a) with the special allegation of **DEADLY WEAPON USED IN A FELONY** in violation of 9 GCA § 80.37.
2. One (1) count of **TERRORIZING** (as a Third Degree Felony), in violation of Title 9 G.C.A. § 19.60(a) and (b)
3. One (1) count of **FAMILY VIOLENCE** (as a Misdemeanor), in violation of Title 9 G.C.A. §§ 30.10(a)(1) and (b) and 30.20(a)

I declare under penalty of perjury that the foregoing is true and correct.
Executed this 11th day of September, 2021.

Prepared by: **JESSICA A. LEE**
Assistant Attorney General


RICHELLE Y. CANTO
Assistant Attorney General