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FILED SUPERIOR COURT OF GUAM

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By:

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## IN THE SUPERIOR COURT OF GUAM HAGÅTÑA, GUAM

| PEOPLE OF GUAM                    |   | )<br>}          | CRIMINAL CASE NO. M 0 382 - 2 GPD Report No. 21-23924   |
|-----------------------------------|---|-----------------|---|
|                                   | vs.                                     | )<br>}          | Charges:  |
| JULIUS BACARRO<br>DOB: 04/10/1987 | MANGONON,                               | )<br>(2)<br>(3) | FAMILY VIOLENCE (As a Misdemeanor) 2 counts ASSAULT (As a Misdemeanor) 2 counts RECKLESS DRIVING (As a Petty Misdemeanor) |
|                                   | *************************************** |                 |   |

## **MAGISTRATE'S COMPLAINT**

The Attorney General of Guam hereby accuses JULIUS BACARRO MANGONON of certain crimes committed as follows:

### FIRST CHARGE

### **Count One**

| On or about the 1st day of Octobe      | r, 2021, in Guam, JULIUS BACARRO MANGONON,                   |
|--|--|
| did commit the offense of Family Viole | ence, in that he did recklessly place a family member or     |
| 1                                      | , in reasonable fear of imminent bodily injury, in violation |
| of 9 GCA §§ 30.10(a)(2) and 30.20(a).  |  |

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#### Count Two

On or about the 1<sup>st</sup> day of October, 2021, in Guam, **JULIUS BACARRO MANGONON**, did commit the offense of *Family Violence*, in that he did recklessly place a family member or household member, to wit, *S.N.* (*DOB: 12/24/2014*), , in reasonable fear of imminent bodily injury, in violation of 9 GCA §§ 30.10(a)(2) and 30.20(a).

### **SECOND CHARGE**

#### **Count One**

On or about the 1<sup>st</sup> day of October, 2021, in Guam, JULIUS BACARRO MANGONON did commit the offense of Assault (As a Misdemeanor), in that he did, by physical menace, intentionally put another, that is, which is, in fear of imminent bodily injury, in violation of 9 GCA §§ 19.30(a)(3) and (e).

#### Count Two

On or about the 1<sup>st</sup> day of October, 2021, in Guam, JULIUS BACARRO MANGONON did commit the offense of Assault (As a Misdemeanor), in that he did, by physical menace, intentionally put another, that is, S.C.N. (DOB: 08/22/2009), in fear of imminent bodily injury in violation of 9 GCA §§ 19.30(a)(3) and (e).

## THIRD CHARGE

On or about the 1<sup>st</sup> day of October, 2021, in Guam, **JULIUS BACARRO MANGONON** did commit the offense of *Reckless Driving (As a Petty Misdemeanor)*, in that he did drive a motor vehicle upon a highway in willful and wanton disregard for the safety of persons and property, in violation of 16 GCA § 9107(a).

Dated on this date, October 2, 2021.

OFFICE OF THE ATTORNEY GENERAL LEEVIN T. CAMACHO, Attorney General of Guam

STEVEN I. HADERLIE

Assistant Attorney General, Prosecution Division

NO PRIORS

# IN THE SUPERIOR COURT OF GUAM DECLARATION

| I, STEVEN J. HADERLIE, Assistant Attorney General, aver upon information and belief          |
|--|
| that this declaration is true. I have reviewed Guam Police Report No. 21-23924, submitted by |
| GPD Officer M. Ramos and others. The report states that these events occurred on Guam:       |

On or about October 1, 2021 at around 9:10 a.m., police spoke with the Dededo residence about an incident involving sex-boyfriend JULIUS BACARRO MANGONON. and MANGONON have a child together, S. N. (DOB 12/24/2014).

told police that earlier that day, she met MANGONON for him to return S. N. (DOB 12/24/2014) to security s custody. There is a court-ordered custody arrangement. security s brother, security was with security along with another of security she children, S. C. N. (DOB 8/22/2009). During the exchange of S. N. (DOB 12/24/2014), security and MANGONON began to trade insults. With the two children and security in security s vehicle, security then drove off.

Once on the road, saw MANGONON drive up behind him. At some point MANGONON passed and drove in front of to abruptly change lanes to avoid a collision.

MANGONON continued to follow tailgating him and driving in such a way that it appeared they might crash into each other. At some point, went to make a right turn onto a new road. MANGONON took a shortcut by driving across a parking lot and then stopped his car in the middle of the new road before got there, apparently attempting to block. MANGONON exited his vehicle and ran toward was vehicle. was able to avoid MANGONON and keep driving.

Once at home, called the police. said that throughout the incident, was in the front passenger seat crying. and her children all felt scared at the events. had to provide extra comfort to S. N. (DOB 12/24/2014). Both children were interviewed and wrote statements that corroborated what and word police. S. C. N. (DOB 8/22/2009) also recorded cell phone video of the events, which matched everyone's stories.

Based on the foregoing, there is probable cause to charge JULIUS BACARRO MANGONON with:

- Two counts of FAMILY VIOLENCE (As a Misdemeanor), one each against and S. N. (DOB 12/24/2014), in violation of 9 GCA §§ 30.10(a)(2) and 30.20(a).
- Two counts of ASSAULT (As a Misdemeanor), one each against S. C. N. (DOB 8/22/2009), in violation of 9 GCA § 19.30(a)(3) and (e).
- One count of RECKLESS DRIVING (As a Petty Misdemeanor) in violation of 16 GCA § 9107(a).

Assistant Attorney General, Prosecution Division