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SUPERIOR COURT  
OF GUAM

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**IN THE SUPERIOR COURT OF GUAM  
HAGÁTÑA, GUAM**

CE 0514-21

12	PEOPLE OF GUAM,	)	S.C. Criminal Case No.: CF
		)	GPD Police Report No.: 21-25527
13		)	
	vs.	)	Charges:
14		)	
15	<b>JONATHAN MICHAEL MARTINEZ,</b>	) 1)	<b>AGGRAVATED ASSAULT</b>
	<i>aka Jonathan Michael Ojeda Martinez,</i>	)	(As a 3 <sup>rd</sup> Degree Felony)
16	DOB: 06/10/1995,	) 2)	<b>FAMILY VIOLENCE</b>
		)	(As a 3 <sup>rd</sup> Degree Felony)
17	Defendant.	) 3)	<b>FAMILY VIOLENCE</b>
18		)	(As a Misdemeanor)
		)	

**MAGISTRATE'S COMPLAINT**

The Attorney General of Guam hereby accuses **JONATHAN MICHAEL MARTINEZ,**  
*aka Jonathan Michael Ojeda Martinez* of certain crimes committed as follows:

**FIRST CHARGE**

On or about the 17<sup>th</sup> day of October, 2021, in Guam, **JONATHAN MICHAEL  
MARTINEZ, aka Jonathan Michael Ojeda Martinez** did commit the offense of *Aggravated*

ORIGINAL

1 *Assault (As a 3<sup>rd</sup> Degree Felony)*, in that he did recklessly cause or attempt to cause serious bodily  
2 injury to another, that is, [REDACTED] in violation of 9 GCA § 19.20(a)(2) and (b).

3  
4 **SECOND CHARGE**

5 On or about the 17<sup>th</sup> day of October, 2021, in Guam, **JONATHAN MICHAEL**  
6 **MARTINEZ, aka Jonathan Michael Ojeda Martinez** did commit the offense of *Family Violence*  
7 (*As a 3<sup>rd</sup> Degree Felony*), in that he did recklessly cause or attempt to cause bodily injury to another  
8 family member or household member, that is, [REDACTED], in violation of 9 GCA §§  
9 30.10(a)(1), (b) and 30.20(a).

10  
11 **THIRD CHARGE**

12 On or about the 17<sup>th</sup> day of October, 2021, in Guam, **JONATHAN MICHAEL**  
13 **MARTINEZ, aka Jonathan Michael Ojeda Martinez** did commit the offense of *Family Violence*  
14 (*As a Misdemeanor*), in that she did recklessly cause or attempt to cause bodily injury to another  
15 family member or household member, that is, [REDACTED] in violation of 9 GCA §  
16 30.10(a)(1) and (b) and § 30.20(a).

17  
18 Dated this day, Monday, October 18, 2021.

19  
20 **OFFICE OF THE ATTORNEY GENERAL**  
**LEEVIN TAITANO CAMACHO, Attorney General**

21   
22 **MINJI E. KIM**  
23 Assistant Attorney General, Prosecution Division

**IN THE SUPERIOR COURT OF GUAM**  
**DECLARATION**

I, MINJI E. KIM, a duly appointed Assistant Attorney General, aver upon information and belief that the following declaration is true and correct to the best of my knowledge. I have reviewed Guam Police Report 21-25527, submitted by Guam Police officers, which revealed the following occurred in Guam:

On or about October 17, 2021, at approximately 9:50 a.m., GPD Officers arrived at a residence in Talofofo in response to a report of a physical altercation in progress. GPD Officers noted a male adult identified to be **JONATHAN MICHAEL MARTINEZ** ("Defendant") walking towards them, appearing to be angry. Defendant then addressed the police by telling the officer to secure his hands in cuffs and to arrest him. Another male, John T. Martinez (Defendant's father, "Mr. Martinez") informed the officers that Defendant had shot his 60-year-old mother, [REDACTED] ("Victim 1") with a pellet gun.

GPD Officers observed Victim 1 in "a great deal of pain", with blood flowing out of puncture wounds on her left leg. Victim 1 stated that her son, Defendant had shot her twice with a pellet gun. She was also experiencing pain to the left side of her face, and she had a headache, because after Defendant shot her with the pellet gun, he kicked her on the left side of her face.

Defendant stated that he was having an argument with his sister [REDACTED] ("Victim 2"), when his mother and father took his two children into their bedroom in order to keep them away from the argument. Defendant stated that he repeatedly told his mother to give his two kids back to him, but she refused. Defendant stated that he then went into his room, grabbed the pellet gun and shot his mother twice in the leg. Defendant stated that the reason why he shot his mother was because he repeatedly warned her not to keep his kids from him.

Defendant's sister, Victim 2 stated that she was having an argument with Defendant and Defendant became more aggressive. He then punched her on her left ear, at which time her son held onto Defendant to stop him. When their parents saw what was happening, they gathered Defendant's children and took them into their room. Victim 2 said that Defendant became upset and began to yell for his kids, and she heard him go into his room and pump a pellet gun. Victim 2 heard Defendant tell their father "I shot your wife". Victim 2 says she did not see him pump the pellet gun or shoot their mother.

Defendant's father, Mr. Martinez stated that when Defendant and Victim 2 were arguing, he and his wife (Victim 1) brought Defendant's children into their room to avoid it. Defendant threatened to grab his BB gun from his bedroom and shoot his mother. Mr. Martinez said that while he was standing at the front door to their bedroom, Defendant approached them and threatened to shoot, if they did not give up his kids. Mr. Martinez stated that Defendant then shot a couple shots to his mother's left leg and simultaneously performed a roundhouse kick to his mother's left facial area. Mr. Martinez called for help, and immediately noted that his wife's leg was bleeding.

GPD Officers confiscated a pellet gun that was used during the incident.

Based on the foregoing, there is probable cause to charge **JONATHAN MICHAEL MARTINEZ** with:

- 1) **AGGRAVATED ASSAULT** (as a 3<sup>rd</sup> Degree Felony), in violation of 9 GCA § 19.20 (a)(2) and (b);
- 2) **FAMILY VIOLENCE** (as a 3<sup>rd</sup> Degree Felony), in violation of 9 GCA § 30.10 (a)(1), (b), and § 30.20 (a);
- 3) **FAMILY VIOLENCE** (as a Misdemeanor), in violation of 9 GCA § 30.10 (a)(1), (b), and § 30.20 (a);

I declare under penalty of perjury that the foregoing is true and correct.  
Executed on this 18th day of October, 2021.

  
\_\_\_\_\_  
**MINJI E. KIM**