



FILED
SUPERIOR COURT
OF GUAM

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By: _____

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

PEOPLE OF GUAM,

vs.

AGO PIUS,
DOB: 04/12/1995 or 05/12/1995,

Defendant.

S.C. Criminal Case No.: CF
GPD Police Report No.: 21-25517

Charge:

**THIRD DEGREE CRIMINAL
SEXUAL CONDUCT**
(As a Second Degree Felony)

CF 0518-21

MAGISTRATE'S COMPLAINT

The Attorney General of Guam hereby accuses **AGO PIUS** of a certain crime committed as follows:


On or about the 17th day of October, 2021, in Guam, **AGO PIUS** did commit the offense of **Third Degree Criminal Sexual Conduct (As a Second Degree Felony)**, in that he intentionally engaged in sexual penetration with another, to wit: inserting his penis in the vagina of **J.N. (DOB:**

ORIGINAL

1 08/20/2000) and used force or coercion to accomplish the sexual penetration, in violation of 9 GCA
2 § 25.25(a)(2) and (b).

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

4
5 **OFFICE OF THE ATTORNEY GENERAL**
6 **LEEVIN TAITANO CAMACHO, Attorney General**

7 
8 **RICHELLE Y. CANTO**
9 Assistant Attorney General, Prosecution Division

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) Report # 21-25517 submitted by Officer A.J.Q. Fejeran (#4024), which revealed the following occurred in Guam:

On or about October 17, 2021, at approximately 3:23 a.m., GPD officers responded to a report of an unconscious female at Ypao Beach Park in Tumon, Guam. Officers observed AGO PIUS (defendant) sitting on a concrete bench under a pavilion, holding J.N. (DOB: 08/20/2000) (victim), who was unconscious, with his fingers inside her mouth. PIUS' friend, Jay Simiuo (witness) told officers PIUS had placed his fingers inside J.N.'s mouth out of concern that she might "swallow her tongue" because she had "passed out."

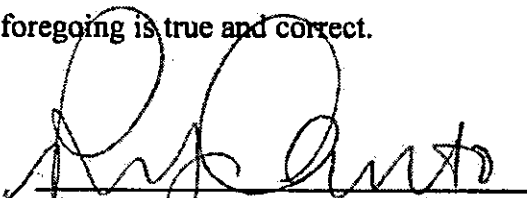
J.N. was taken to the hospital. When she regained consciousness later, officers noted she was shivering and crying. J.N. reported PIUS had taken her to Ypao beach and raped her. J.N. told officers prior to PIUS taking her clothes off, he had been consuming beer. J.N. stated she tried her best to resist PIUS, however he was able to position her on top of his lap and inserted his penis in her vagina. J.N. stated she felt she was "in shock and could not move, with her body feeling numb." After PIUS ejaculated in her vagina, J.N. stated she "felt numb and really scared," and felt her head "slowly moving forward" as she blacked out.

Officers found various articles of J.N.'s clothing at the Ypao beach pavilion, along with blood on J.N.'s underwear that she identified to be period blood.

PIUS told officers he did not know J.N.'s name and only called her "babe," and that she was a neighbor that just moved in. PIUS initially claimed the clothes were strewn about because he and J.N. had gone swimming. He later admitted he had sex with J.N..

Based on the foregoing, there is probable cause to charge AGO PIUS with one (1) count of **THIRD DEGREE CRIMINAL SEXUAL CONDUCT** (as a Second Degree Felony) in violation of Title 9 G.C.A. §25.25(a)(2) and (b).

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


RICHELLE Y. CANTO
Assistant Attorney General



IN THE SUPERIOR COURT OF GUAM

HAGÁTÑA, GUAM



Magistrate Judge
Jonathan R. Quan
Superior Court of Guam

CF 0518-21
Police Report No.: 21-25517

Time in Community: UNKNOWN
Employer: UNKNOWN
Occupation: UNKNOWN
Income: UNKNOWN

Name: PIUS, Ago

Address: UNKNOWN
Contact Number: UNKNOWN
Email address: UNKNOWN

Charge(s): See Magistrate's Complaint

1. The defendant claims he/she is: born in UNKNOWN on 04/12/1995, a 26 year old (UNKNOWN) (CHUUKESE) MALE.
2. Remarks: The defendant requires the assistance of a Chuukese-speaking interpreter. All information contained in this report was obtained from GPD arrest records and Probation Office.

Prior Probation Cases: NO PRIORS