



FILED
SUPERIOR COURT
OF GUAM

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CLERK OF COURT

By:

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IN THE SUPERIOR COURT OF GUAM
HAGÁTÑA, GUAM

CF 0524-21

PEOPLE OF GUAM,

) S.C. Criminal Case No.: CF

) GPD Report No.: 21-25665

vs.

) Charges:

ERSON KARSOM,
DOB: 04/09/1991

) 1.) SIMPLE STALKING
) (As a 3rd Degree Felony)

) 2.) FAMILY VIOLENCE

) (As a Misdemeanor)

) 3.) FAMILY VIOLENCE

) (As a Misdemeanor)

) 4.) CRIMINAL TRESPASS

) (As a Misdemeanor)

) 5.) CRIMINAL TRESPASS

) (As a Petty Misdemeanor)

Defendant.

MAGISTRATE'S COMPLAINT

The Attorney General of Guam hereby accuses **ERSON KARSOM** of certain crimes
committed as follows:

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ORIGINAL

1 **FIRST CHARGE**

2 On or about the period between September 1, 2021 to September 14, 2021, *inclusive*, in
3 Guam, **ERSON KARSOM** did commit the offense of *Simple Stalking (As a 3rd Degree Felony)*,
4 in that he did willfully, maliciously, and repeatedly, follow or harass another person, *specifically*:
5
6 [REDACTED] or made a credible threat with intent to place [REDACTED] or a member of her
7 immediate family in fear of death or bodily injury, in violation of 9 GCA § 19.70(a) and (d).

8 **SECOND CHARGE**

9 On or about the period between September 1, 2021 to September 14, 2021, *inclusive*, in
10 Guam, **ERSON KARSOM** did commit the offense of *Family Violence (As a Misdemeanor)*, in that
11 he did recklessly cause or attempt to cause bodily injury to another family or household member, *that*
12 *is*: [REDACTED] in violation of 9 GCA §§ 30.10(a)(1) and 30.20(a)(1).

13 **THIRD CHARGE**

14 On or about the period between September 1, 2021 to September 14, 2021, *inclusive*, in
15 Guam, **ERSON KARSOM** did commit the offense of *Family Violence (As a Misdemeanor)*, in that
16 he did place a family or household member, *that is*: [REDACTED], in reasonable fear of imminent
17 bodily injury, in violation of 9 GCA §§ 30.10(a)(2) and 30.20(a)(1).

18 **FOURTH CHARGE**

19 On or about the period between December 1, 2020 to December 31, 2020, *inclusive*, in
20 Guam, **ERSON KARSOM** did commit the offense of *Criminal Trespass (As a Misdemeanor)*,
21 when, knowing that he was not licensed or privileged to do so, he entered or surreptitiously remained
22 in the habitable property of [REDACTED], *to wit: the dwelling of* [REDACTED], in violation of
23 9 GCA § 37.30(a).
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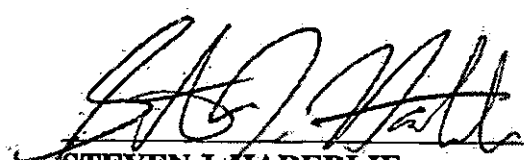
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FIFTH CHARGE

On or about October 18, 2021, in Guam, **ERSON KARSOM** did commit the offense of *Criminal Trespass (As a Petty Misdemeanor)*, in that, knowing that he was not licensed or privileged to do so, he did enter or remain in any place as to which notice against trespass was given by actual communication to **ERSON KARSOM**, in violation of 9 GCA § 37.30(b)(1).

Dated this 20th day of October, 2021.

OFFICE OF THE ATTORNEY GENERAL
LEEVIN TAITANO CAMACHO, Attorney General



STEVEN J. HADERLIE
Assistant Attorney General, Prosecution Division

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. 21-25665, submitted by GPD Officer J. Quenga and others. The report states that these events occurred on Guam:

On or about October 18, 2021 at 7:25 p.m. police spoke with [REDACTED] (victim) at her Dededo residence. [REDACTED] told police her on-and-off-again boyfriend of 12 years and the father of their six children, ERSON KARSOM (defendant), is causing problems.

[REDACTED] told police that KARSOM had arrived at her residence that night for his phone although [REDACTED] told him not to come and that she doesn't have his phone.

[REDACTED] told police that every day from approximately September 1, 2021 to September 14, 2021, KARSOM would throw objects at her because he was angry. Once he threw a knife. He would also slap her. She remembers him slapping or hitting her three times between September 1 and 14. One of those times was a backhand strike to the face, and her mouth bled. She would always tell KARSOM he is not supposed to be at her residence and inform him to leave. One of their children, E. R. (age 10) has seen KARSOM try to hit [REDACTED] and argue and fight a lot. Another of their children, J. R. (age 8) said he recently saw KARSOM throw a knife at [REDACTED]. Afterward, J. R. (age 8) went and grabbed the knife and hid it to protect his mother.

In December 2020, KARSOM broke into [REDACTED]'s residence through her front door and argued with her. In September 2017, KARSOM hit [REDACTED]'s arm with a metal bat. She said she has constantly and repeatedly told KARSOM not to come to her residence but he continues to come over. She no longer knows what to do and is afraid he will hurt or kill her. She could not recall to police all the times he has assaulted her because there have been so many. She has tried to avoid him at times by staying with her six kids at other locations.

KARSOM admitted to police that he arrived at the residence on 10/18/21 to talk about their relationship and get his phone back. He also admitted previously throwing things and said he knew he was not supposed to be at the residence.

Based on the foregoing, there is probable cause to charge ERSON KARSOM with the following:

- One count of SIMPLE STALKING (As a 3rd Degree Felony), against [REDACTED], in violation of 9 GCA § 19.70(a) and (d);
- One count of FAMILY VIOLENCE (As a Misdemeanor) against [REDACTED], in violation of 9 GCA § 30.10(a)(1) and 9 GCA § 30.20(a)(1);
- One count of FAMILY VIOLENCE (As a Misdemeanor) against [REDACTED], in violation of 9 GCA § 30.10(a)(2) and 9 GCA § 30.20(a)(1);
- One count of CRIMINAL TRESPASS (As a Misdemeanor) in violation of 9 GCA § 37.30(a); and
- One count of CRIMINAL TRESPASS (As a Petty Misdemeanor) in violation of 9 GCA § 37.30(b)(1).

Executed this 20 day of October, 2021.


STEVEN J. HADERLIE