

ORIGINA

1	FIRST CHARGE
2	On or about the 24 th day of October, 2021, in Guam, JAYRINA CRUZ PANGELINAN
3 4	(aka Jayrina Christine Cruz Pangelinan) did commit the offense of Aggravated Assault (As a
5	Third Degree Felony), in that she did recklessly cause or attempt to cause bodily injury to
6	with a deadly weapon, that is: a motor vehicle, in violation of 9 GCA § 19.20(a)(3)
7	and (b).
8	SECOND CHARGE
9 10	On or about the 24 th day of October, 2021, in Guam, JAYRINA CRUZ PANGELINAN
11	(aka Jayrina Christine Cruz Pangelinan) did commit the offense of Family Violence (As a Third
12	Degree Felony), in that she did recklessly cause or attempt to cause bodily injury to another family
13	member or household member, that is: (a) (a) (a) (b) (b) (c) (c) (c) (c) (c) (c) (c) (c) (c) (c
14	and 30.20(a).
15	THIRD CHARGE
16 17	On or about the 24 th day of October, 2021, in Guam, JAYRINA CRUZ PANGELINAN
18	(aka Jayrina Christine Cruz Pangelinan) did commit the offense of Criminal Mischief (As a
19	Third Degree Felony), in that she did intentionally damage the motor vehicle of another, to wit: a
20	2004 Chevrolet Express Van, belonging to Ground Tech Maintenance, in violation of 9 GCA
21	§§ 34.50(d) and 34.60(a), as amended.
22 23	FOURTH CHARGE
23 24	On or about the 24 th day of October, 2021, in Guam, JAYRINA CRUZ PANGELINAN
25	(aka Jayrina Christine Cruz Pangelinan) did commit the offense of Criminal Mischief (As a
26	Misdemeanor), in that she did intentionally damage the property of another, to wit: Ground Tech
27	Maintenance, in violation of 9 GCA §§ 34.50(c) and 34.60(c), as amended.
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1	FIFTH CHARGE
2	On or about the 24 th day of October, 2021, in Guam, JAYRINA CRUZ PANGELINAN
3	(aka Jayrina Christine Cruz Pangelinan) did commit the offense of Leaving the Scene of an
4	Accident - Property Damage (As a Petty Misdemeanor), in that she was the operator of any vehicle
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6	which was involved in an accident resulting in injury or death to any person or in damage to any real
7	or personal property and she did not immediately stop her vehicle at the scene of such accident, in
8	violation of 16 GCA § 3501(a) and (g).
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10	Dated this day, Wednesday, October 27, 2021.
11	OFFICE OF THE ATTORNEY GENERAL
12	LEEVIN TAITANO CAMACHO, Attorney General of Guam
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14 15	ALYSA DRAPER-DEHART
15	Assistant Attorney General, Prosecution Division
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	Magistrate's Complaint - JAYRINA CRUZ PANGELINAN (aka Jayrina Christine Cruz Pangelinan) Page 3 S:\TRICIA\2021\Magi's\Pangelinan, Jayrina (21-26240-26241) 3dAA-3dFV-3dCM-mCM-LSwPD (add) 102721.wpd

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IN THE SUPERIOR COURT OF GUAM DECLARATION

COMES NOW, Alysa Draper-Dehart, a duly appointed Assistant Attorney General, and aver, upon information and belief, that the following is true. I have reviewed the Guam Police Case No. 21-26240 and 21-262241 submitted by Officer Atan and others which revealed the following occurred in Guam:

On or about October 24, 2021 at around 7:15 PM, officers responded to a crash located near the Ground Tech Maintenance ("GTM") area. Upon arrival they met with (Victim 1) who stated that he was an employee with GTM and had been in the company van (GLP)

(Victum 1) who stated that he was an employee with GTM and had been in the company van (GLP MNG6956) when his girlfriend JAYRINA CRUZ PANGELINAN ("Defendant") came over and began to argue with him. The Defendant started to shout derogatory terms at him and attempted to slap him. The Defendant then started to throw items towards him such as tools, shoes and other items then before proceeding to her car a green Toyota Rav4. The Defendant got into her car and stated "I'm gonna kill you" and accelerated towards him. **Characteristic started** to get out of the way; however, the Defendant would "peel out" in the mud, turn around and accelerate towards the van colliding with the rear end of the van.

GTM before entering the garage area to get away. The Defendant followed him into the garage and continued to hit him, before returning to her car. The Defendant then reversed and hit a wooden fence before leaving the area. Officers at the scene noted the van had damages to the right rear fender and panel window and that part of the van and the bad mud stains. Officers also spoke to Johnny Aguon the owner of GTM who stated his company van and front gate had been damaged.

On October 26, 2021 at around 4:05 PM, officers were called back to GTM where the Defendant was then located in the green Toyota Rav4. Surveillance also recorded the incident.

Based on the foregoing, there is probable cause to charge JAYRINA CRUZ PANGELINAN with:

- 1. AGGRAVATED ASSAULT (as a Third-Degree Felony) in violation of 9 GCA § 19.20 (a)(3) and (b)
- 2. FAMILY VIOLENCE (as a Third Degree Felony), in violation of 9 GCA § 30.10 (a)(1) and § 30.20 (a)
- 3. CRIMINAL MISCHIEF (As a 3rd degree felony) in violation of title 9 GCA § 34.50 (d) and § 34.60 (a)
- 4. CRIMINAL MISCHIEF (As a Misdemeanor) in violation of title 9 GCA § 34.50 (c) and § 34.60 (c)
- 5. LEAVING THE SCENE OF AN ACCIDENT PROPERTY DAMAGE (as a petty misdemeanor) in violation of 16 G.C.A. § 3501 (a) and (g)

I declare under penalty of perjury that the foregoing is true and correct. Executed on this 27th day of October, 2021.

ALYSA DRAPER-DEHART Assistant Attorney General, Prosecution Division