Testimony Before the Council of the District of Columbia

Committee on the Judiciary and Public Safety

Public Hearing:
B24-0416, the “Revised Criminal Code Act of 2021”
December 2, 2021

Stephanie McClellan
Deputy Director, DC KinCare Alliance
Good morning, Chairperson Allen and members of the Committee on the Judiciary and Public Safety. My name is Stephanie McClellan and I am the Deputy Director of DC KinCare Alliance. I am pleased to testify today regarding the proposed legislation being considered by this Committee, B24-0416, the “Revised Criminal Code Act of 2021”. DC KinCare Alliance is a member of the Fair Budget Coalition and we support budget priorities and policies that alleviate poverty in the District of Columbia.

The mission of DC KinCare Alliance is to support the legal, financial, and related service needs of relative caregivers who step up to raise children in their extended families in times of crisis when the children’s parents are not able to care for them due to mental health and substance use disorders, incarceration, death, abuse and neglect, and/or deportation. DC KinCare Alliance is the only organization in DC focused solely on serving relative caregivers raising DC’s at-risk children. We rely on our Relative Caregiver Community Board, comprised of 20 relatives raising 25 at-risk DC children, to identify systemic issues with policies and practices affecting DC families.

Through our work supporting relative caregivers, we come into contact with many children who were abused and/or neglected in their parental homes before they came to live with their relatives. In our experience, these children are rarely removed to foster care by the DC Child and Family Services Agency or have accompanying neglect cases filed on their behalf by the Office of the Attorney General so that they can be safely reunified with their parents or achieve permanency though adoption or permanent guardianship. Even more rarely are the abused and neglected children’s perpetrators criminally charged or successfully prosecuted by the U.S. Attorney’s office. As a result, many children remain at home with their abusers.

Given the current under-prosecution of perpetrators against our most vulnerable DC residents, abused and neglected children, it is imperative that reform of our criminal laws does
not have the unintended consequence of reducing successful prosecution of child abusers even further. There are two main areas of concern that we have regarding the proposed changes to the criminal code that may make it more difficult to hold child abusers criminally liable for their actions. First, I would draw your attention to the changes in how child cruelty is charged, particularly with regard to who can be charged with that crime. Second, we are concerned with changes to how felony murder is charged and how that will impact homicide prosecutions when children are fatally abused or neglected -- usually in secret and often by more than one perpetrator.

Under the current Cruelty to Children statute, D.C. Code § 22-1101,\(^1\) anyone can be charged with torturing, beating or willfully maltreating a child. This statute is replaced in the proposed legislation by Criminal Abuse of a Minor (RCCA § 22A-2501)\(^2\) and Criminal

\(^1\) § 22–1101. Definition and penalty.
(a) A person commits the crime of cruelty to children in the first degree if that person intentionally, knowingly, or recklessly tortures, beats, or otherwise willfully maltreats a child under 18 years of age or engages in conduct which creates a grave risk of bodily injury to a child, and thereby causes bodily injury.
(b) A person commits the crime of cruelty to children in the second degree if that person intentionally, knowingly, or recklessly:
   (1) Maltreats a child or engages in conduct which creates a grave risk of bodily injury to a child; or
   (2) Exposes a child, or aids and abets in exposing a child in any highway, street, field house, outhouse or other place, with intent to abandon the child.
(c)(1) Any person convicted of cruelty to children in the first degree shall be fined not more than $10,000 or be imprisoned not more than 15 years, or both.
   (2) Any person convicted of cruelty to children in the second degree shall be fined not more than the amount set forth in § 22-3571.01 or be imprisoned not more than 10 years, or both.

\(^2\) § 22A-2501. Criminal abuse of a minor.
(a) First degree. An actor commits first degree criminal abuse of a minor when the actor:
   (1) Is reckless as to the fact that:
      (A) The actor has a responsibility under civil law for the health, welfare, or supervision of the complainant; and
      (B) The complainant is under 18 years of age; and
   (2) Either:
      (A) Purposely causes serious mental injury to the complainant; or
      (B) Recklessly causes serious bodily injury to the complainant.
(b) Second degree. An actor commits second degree criminal abuse of a minor when the actor:
   (1) Is reckless as to the fact that:
      (A) The actor has a responsibility under civil law for the health, welfare, or supervision of the complainant; and
      (B) The complainant is under 18 years of age; and
   (2) Causes significant bodily injury to the complainant.
(c) Third degree. An actor commits third degree criminal abuse of a minor when the actor:
   (1) Is reckless as to the fact that:
      (A) The actor has a responsibility under civil law for the health, welfare, or supervision of the complainant; and
Neglect of a Minor (RCCA § 22A-2502), which only attaches criminal liability to someone with legal responsibility under civil law for the child. This leaves a troubling hole in the statute

(B) The complainant is under 18 years of age; and
(2) Either:
(A) Causes serious mental injury to the complainant; or
(B) In fact, commits a predicate offense against persons against the complainant.
(d) Exclusion from liability. An actor does not commit an offense under this section when, in fact, the actor’s conduct is specifically permitted by a District statute or regulation.
(e) Affirmative defense. It is an affirmative defense to liability under subsections (b) and (c) of this section that the actor, in fact:
(1) Is not a person with legal authority over the complainant; and
(2) Reasonably believes that a person with legal authority over the complainant, acting consistent with that authority, would give effective consent to the injury or the conduct constituting the offense.
(f) Penalties.
(1) First degree criminal abuse of a minor is a Class 6 felony.
(2) Second degree criminal abuse of a minor is a Class 8 felony.
(3) Third degree criminal abuse of a minor is a Class 9 felony.
(g) Definitions. For the purposes of this section, the term “predicate offense against persons” means:
(1) Fourth degree assault under § 22A-2202(d);
(2) Criminal threats under § 22A-2203;
(3) Offensive physical contact under § 22A-2204;
(4) Criminal restraint under § 22A-2402;
(5) Stalking under § 22A-2801; or
(6) Electronic stalking under § 22A-2802.
that will allow many abusers to act with impunity. For example, a child abuser often may not
have civil legal responsibility for a child but, as a practical matter, have physical control over
the child every day. The classic example is that of a mother’s boyfriend or paramour who may
live with the child and act as a parent but have no legal responsibility for that child.

The recent near fatality case of two-year-old L.D. is a case in point. The Gerstein filed
in the case of United States v. MENNIEFIELD, MAURICE MJD, 2021 FD1 001717, reveals a
horror story of torture endured by little L.D. at the hands of her mother’s boyfriend. Mr.
Menniefield broke L.D.’s jaw, her ribs, and caused internal injuries to her organs. (See Exhibit
A attached.) Then, Mr. Menniefield hid L.D. at his sister’s home. MPD officers found L.D.
under a bed and transported her by ambulance to Children’s National Hospital. Mr.
Menniefield was charged with 1st Degree Cruelty to Children on March 24, 2021 and plead
guilty to lesser charges of Aggravated Assault and simple Assault on September 27, 2021. It is
shocking to think that under the proposed statute Mr. Menniefield could not have been charged
with 1st Degree Cruelty to Children simply because he had no legal relationship to her.

When children suffer fatal abuse, their alleged perpetrators are usually charged with
felony murder rather than first degree murder. For example, Tyra Anderson is charged with
felony murder and 1st degree cruelty to children in the February 2020 death of eleven-month-
old Mackenzie Anderson, and Ta’Jenna Eason and her husband Antonio Turner are charged

(1) An actor does not commit an offense under this section for conduct that, in fact, constitutes surrendering a
newborn child in accordance with § 4-1451.01 et seq.
(2) An actor does not commit an offense under this section when, in fact, the actor’s conduct is specifically
permitted by a District statute or regulation.
(e) Affirmative defense. It is an affirmative defense to liability under subsections (b) and (c)(2)(B) of this section
that the actor, in fact:
(1) Is not a person with legal authority over the complainant; and
(2) Reasonably believes that a person with legal authority over the complainant, acting consistent with that
authority, would give effective consent to the conduct constituting the offense.
(f) Penalties.
(1) First degree criminal neglect of a minor is a Class 8 felony.
(2) Second degree criminal neglect of a minor is a Class A misdemeanor.
(3) Third degree criminal neglect of a minor is a Class B misdemeanor.
with felony murder and 1st degree cruelty to children in the April 2020 death of two-year-old Gabriel Eason. (See Exhibits B, C and D attached.) The reason is that it is difficult to prove that the child’s killers intended to kill them. More likely, the child was tortured for their whole young life and the killer or killers’ plan was to keep them alive and beat them more, not for that particular episode of abuse to end their life. The sad fact is that if you kill a child quickly, for example, by pointing a gun at them and shooting them, it is easier to hold the murderer accountable than if you slowly torture a child to death.

Under the current Felony Murder statute, D. C. Code § 22-2101, 2104, the maximum penalty is a life sentence for First Degree Murder. Under the proposed legislation, Felony Murder (RCCA § 22A-2101(b)) with a Child Enhancement under § 22A-2101d, has a maximum penalty of 30 years for Second Degree Murder. Even more concerning are the changes to what may be charged as a predicate offense to felony murder, the intent required on the part of the perpetrator, and who can be held liable for felony murder at all.

Currently, Child Cruelty, D.C. Code § 22A-2101, which requires proof that the perpetrator recklessly caused bodily injury to the child, is a predicate for felony murder. Under the proposed legislation, only First Degree Criminal abuse of a Minor (RCCA § 22A-2101(b)(3)(H)), which requires that the perpetrator knowingly caused serious bodily injury, is a predicate for felony murder. Proof of the perpetrator’s intent is notoriously difficult to prove, which is why child abuse that results in the death of a child is usually charged as felony murder, rather than first degree murder. This Committee needs to decide if it is more important to hold child abusers accountable for the torture and death of children or if it is more important to require the U.S. Attorney to prove what the child abuser was thinking while they were torturing and killing the child.

Last, but not least, is the incredibly important issue of accomplice liability. Under current D.C. Code § 22-1805, an accomplice is held liable in the same manner as the principal.
If a mother holds her child down while her boyfriend beats her child to death, she is as responsible as if she beat her child herself. Under the proposed legislation (RCCA § 22A-2101(g)), an accomplice cannot be held liable for felony murder. In our opinion, that change eviscerates the felony murder statute.

Almost all child abuse homicides occur out of the view of witnesses. Many abused children are abused at the hands of more than one perpetrator and it is almost impossible to determine exactly who delivered the fatal blow to the child and when. The example always proffered in law schools is that of the get away driver. Should a get away driver in a bank robbery be held liable for a homicide that he did not know would happen if it was committed during the course of bank robbery that he did know would happen? Reasonable minds may differ, but the truth is that is not how the felony murder statute is used by prosecutors in real life. In real life, accomplices are held accountable through felony murder when it is clear that multiple parties participated in the child abuse homicide but it is difficult to determine which person delivered the fatal blow.

Thank you for the opportunity to testify today. I am happy to answer any questions.
Exhibit A p. 001

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW N.O.:

DEFENDANT'S NAME:
Maurice Menefield

NICKNAME:
Mo

ALIASES:
N/A

CCN:
20-18-564

FDD:
DC 586071

SEX:
M

RACE:
Black

DOB:
02/05/92

HT:
6'11"

WT:
160

EYES:
Blue

HAIR:
Brown

COMPL.
N/A

SCARS:
N/A

MARLS:
N/A

TAT'TOS:
N/A

DEFENDANT'S HOME ADDRESS:
517 Harvard Street, NW, #A, Washington, D.C., 20001

TELEPHONE NUMBER:
(202) 470-5850

DEFENDANT'S BUSINESS ADDRESS:
N/A

TELEPHONE NUMBER:
N/A

COMPLAINANT'S NAME:
L.D. (2-year-old-female)

LOCATION OF OFFENSE:
517 Harvard Street, NW, #A, Washington, D.C., 20001

DATE OF OFFENSE:
December 22, 2020

TIME OF OFFENSE:
Multiple hours

CAUTION AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for wanted person when using the caution indicator:

- 01 = Armed and Dangerous
- 02 = Violent Tendencies
- 03 = Sexual Victim
- 04 =心理健康
- 05 = Addict
- 06 = Other
- 07 = Substance Abuse

- 08 = Known as harmful criminal
- 09 = Known to cause injury
- 10 = Known to cause death

- 11 = Known to abuse drugs
- 12 = Escape Risk
- 13 = Explosive Disposal

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

POLICE REPORT

On December 23, 2020, at approximately 11:33 AM, your Affiant, a Metropolitan Police Department Detective, was assigned a physical abuse allegation to investigate. Your Affiant, a MPD Official and a Social Worker from the Child and Family Services Agency (CPSA) responded to 517 Harvard Street, NW, #A, Washington, D.C. to make contact with the family. Two allegations of physical abuse had been called into the CPSA hotline.

The first allegation was called in at 11:18 PM on December 22, 2020. Reporting Party One (RP-1) stated that the Complainant’s mother beat her six (6) children on a regular basis. RP-1 advised that the Complainant’s mother also beat the Suspect Maurice Menefield. RP-1 stated that one of the children called her and informed her that Suspect Maurice Menefield had beaten C-1’s mother and when she ran away from him, she was hit by a car. RP-1 advised that the child stated her mother was scared because the Suspect Maurice Menefield had also beaten the Complainant. RP-1 advised that the Complainant’s mother was at the hospital when Suspect Maurice Menefield took the Complainant and left her at an unknown location. Suspect Maurice Menefield then returned to 517 Harvard Street, NW, #A, Washington, D.C. and was in another physical altercation with the Complainant’s mother. RP-1 advised that the whereabouts of the Complainant are unknown and the child is not Suspect Maurice Menefield’s child.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR
Maurice Menefield
Charge: Child Abuse

ASSISTANT UNITED STATES ATTORNEY

Affiant Signature: D2-1563

SUBSCRIBED AND SWORN BEFORE ME THIS 24th DAY OF January, 2020

Oaths of Deputy Clerk Superior Court of the District of Columbia

Revision Date: 11-15-16
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Menifeild, Maurice
NICKNAME: Mo
ALIASES: N/A
SEX: M
RACE: Black
DOB: 02/06/92
HT: 6'0"
WT: 160
EYES: BrD
HAIR: Brown
COMPL: Medium
SCARS, MARKS, TATTOOS: N/A

DEFENDANT'S HOME ADDRESS:
517 Harvard Street, NW, #A, Washington, D.C., 20001

DEFENDANT'S BUSINESS ADDRESS:
N/A

COMPLAINT'S NAME:
L.D. (2-year-old-female)

LOCATION OF OFFENSE:
517 Harvard Street, NW, #A, Washington, D.C., 20001

DATE OF OFFENSE:
December 22, 2020

TIME OF OFFENSE:
Multiple hours

CAUTION AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for wanted person when using caution indicator.

- 00 = Armed and Dangerous
- 05 = Violent Tendencies
- 90 = Diabetic
- 10 = Mental Instability
- 20 = Heart Condition
- 30 = Sexually Violent Predator
- 60 = Known to abuse drugs
- 55 = Methamphetamine
- 30 = Other
- 55 = Alcohol
- 45 = Heroin
- 10 = Gold
- 30 = Explosive Device
- 35 = Escaped
- 70 = Suicidal
- 80 = Medication Required

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

The second allegation was called in at 8:40AM on December 23, 2020. Reporting Party Two (RP-2 stated on December 22, 2020, the Complainant's mother "went off" and beat the Complainant for urinating on the bed. RP-2 stated she/he did not observe the abuse, but stated that an unknown person had seen the Complainant and her face was swollen and her jaw was possibly broken. The CFSA hotline worker advised that the call was disconnected and MPD Officers were called for a "Check on the Welfare." MPD Officers responded to 517 Harvard Street, NW, #A, Washington, D.C. and made contact with the Complainant's mother. CFSA reported that the Complainant was not home and her mother advised that she had been with her father since Monday, December 21, 2020. It was reported that the Complainant's mother was "acting strange, nervous and scared as if something may have happened." The Complainant's mother refused to provide Officers with any identifying information for the Complainant's whereabouts. CFSA requested a Social Worker to respond to the scene.

INVESTIGATION

A Social Worker responded to 517 Harvard Street, NW, #A, Washington, D.C. and made contact with the Complainant's mother and four (4) children, ages 5 to 12. The Social Worker did not receive any immediate disclosures from the children and the Complainant's mother stated her eldest daughter was with her father and her youngest daughter, the Complainant (2 year old female) was with a different father. The Complainant's

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Maurice Menifeild
Charge With: First Degree Child Abuse

ASSISTANT UNITED STATES ATTORNEY

AFFIDANT'S SIGNATURE:

SUBSCRIBER AND SWEARING BEFORE ME THIS 2Y
DAY OF Dec. 2020

(JUDGE/SUPERIOR COURT OF THE DISTRICT OF COLUMBIA)

Form CR-127-1000
Revision Date: 11/19/06
Exhibit A p. 003

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Menifee, Maurice
NICKNAME: Mo
ALIASES: N/A
SEX: M
RACE: Black
DOB: 02/06/92
HEIGHT: 6'0"
WEIGHT: 160
EYES: BRO
HAIR: Brown
COMPL.: Medium
SCARS, MARKS, TATTOOS: N/A
TELEPHONE NUMBER: (626) 474-5540
DEFENDANT'S HOME ADDRESS: 517 Harvard Street, NW, #A, Washington, D.C., 20001
DEFENDANT'S BUSINESS ADDRESS: N/A
COMPLAINANT'S NAME: L.D. (2-year-old-female)
LOCATION OF OFFENSE: 517 Harvard Street, NW, #A, Washington, D.C., 20001
DATE OF OFFENSE: December 22, 2020
TIME OF OFFENSE: Multiple hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.
- 00 = Armed and Dangerous
- 05 = Vindictive Tendencies
- 10 = Marshal Art Expert
- 20 = Heart Condition
- 30 = Sexually Violent Predator
- 40 = Allergies
- 45 = Diabetes
- 50 = Hypertension
- 55 = Alcoholism
- 60 = Anemia
- 65 = Hemophilia
- 70 = Schizophrenia
- 75 = Epilepsy
- 80 = Medication Required
- 85 = Known to abuse drugs
- 90 = Escape Risk
- 95 = Explosive Explosive

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

mother refused to provide any identifying information as to where the Complainant was and would not provide names of either father.

Your Affiant and a MPD Official, both Detectives from MPD's Youth and Family Services Division / Physical and Sexual Abuse Branch (YFSD/PSAB) responded to 517 Harvard Street, NW, #A, Washington, D.C. to assist in the investigation.

INTERVIEW WITH THE COMPLAINANT'S MOTHER

Your Affiant interviewed the Complainant's mother, who fluctuated from crying and frustrated to irate. The Complainant's mother refused to provide identifying information as to where the Complainant was located. The Complainant's mother denied knowing Suspect Maurice Menifee. Your Affiant advised the Complainant's mother that there is reason to believe the Complainant was injured and if she would provide the requested information, a check could be made but until that, MPD and CFSA were going to be involved. The Complainant's mother advised that her eldest daughter was at an unknown location in Baltimore. The Complainant's mother stated that her eldest daughter was most likely at her father's current significant other's residence and she does not know nor will provide the information to MPD.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Maurice Menifee
Charge With: First Degree Cruelty to Children
ASSISTANT UNITED STATES ATTORNEY

AFFIANT'S SIGNATURE:

SUBSCRIBED AND SWORN BEFORE ME THIS ___ DAY OF ___, 2020
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME:
Maurice Menefield

NICKNAME:
Mo

ALIASES:
N/A

SEX:
M

RACE:
Black

DOB:
02/06/92

HT:
6'1"

WT:
160

EYES:
BGD

HAIR:
Brown

COMPL:
Medium

SCARS, MARKS, TATTOOS:
N/A

DEFENDANT'S HOME ADDRESS:
517 Harvard Street, NW, #A, Washington, D.C., 20001

DEFENDANT'S BUSINESS ADDRESS:
N/A

TELEPHONE NUMBER:
(202) 744-5840

TELEPHONE NUMBER:
N/A

COMPLAINANT'S NAME:
L.D. (2-year-old-female)

LOCATION OF OFFENSE:
517 Harvard Street, NW, #A, Washington, D.C., 20001

DATE OF OFFENSE:
December 22, 2020

TIME OF OFFENSE:
Multiple hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

90 = Armed and Dangerous
85 = Hemophiliac
55 = Alcoholic
04 = Other
79 = Serial Killer
80 = Violent Tendencies
90 = Diabetic
66 = Allergies
65 = Epilepsy
80 = Medication Required
10 = Martial Arts Expert
59 = Heart Condition
20 = Known to abuse drugs
75 = Escape Risk
18 = Explosive Expertise

GOES A BRIEF DESCRIPTION OF WHAT HAPPENED:

Your Affiant provided a name for this father and the Complainant’s mother confirmed the name. The Complainant’s mother advised that her youngest daughter, the Complainant, was with a different father and had been for a few days. The Complainant’s mother stated the Complainant was fine and she saw a photograph of her recently and FaceTimed with her. The Complainant’s mother showed your Affiant a photograph of the Complainant with colorful beads in her hair. Again, the Complainant’s mother refused to provide identifying information and stated the Complainant was in Virginia and then changed it to Maryland and then back to Virginia. Your Affiant provided a name for the father of the Complainant to which the Complainant’s mother appeared shocked and asked something similar to, “How do you know his name?” The Complainant’s mother confirmed that this person was the Complainant’s father, but stated she would not provide any further information.

The Complainant’s mother advised she was trying to run across the street on December 22nd, 2020 and she was struck by a car and she thought she had a concussion so she walked to Howard Hospital to be evaluated. The Complainant’s mother advised that she learned there was commotion at her house so she pulled her IV out and left with all the “sticky” items on her and returned home.

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Maurice Menefield

Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

AFFIANT’S SIGNATURE:

SUBSCRIBED AND SWORN BEFORE ME THIS 27

DAY OF ___________________________ 2020

(JUDGE), DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-09-06
Superior Court of the District of Columbia  
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Maurice Menfield
Charge: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

Submit this warrant to the Warrant Clerk as soon as possible to ensure its timely execution.

SUBSCRIBER AND SWORN BEFORE ME THIS 24
DAY OF December 2020

(JUDICIAL DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

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| SEX:              | M                |
| RACE:             | Black            |
| DOB:              | 02/06/92         |
| HGT:              | 6'0"             |
| WGT:              | 160              |
| EYES:             | BRO              |
| HAIR:             | Brown            |
| COMPL:            | Medium           |
| SCARS, MARKS, TATTOOS: | N/A |

DEFENDANT'S HOME ADDRESS: 517 Harvard Street, NW, #A, Washington, D.C., 20001

DEFENDANT'S BUSINESS ADDRESS: N/A

COMPLAINT'S NAME: L.D. (2-year-old-female)

LOCATION OF OFFENSE: 517 Harvard Street, NW, #A, Washington, D.C., 20001

DATE OF OFFENSE: December 22, 2020
TIME OF OFFENSE: Multiple hours

TELEPHONE NUMBER FOR USW NO.:

INTERVIEWS WITH SIBLINGS

Your Affiant initially held brief safety checks with the four (4) children on scene. The 12 year old male child, Witness One (W-1), initially made no disclosure of abuse regarding himself or the Complainant. W-1 asked Det. Your Affiant if she would walk around the block with him and talk. As your Affiant and W-1 walked down the street, W-1 advised that there was a fight at his house last night and his uncle was arrested. W-1 stated he knows of "Mo," but does not know him. W-1 stated "Mo" has a temper. Your Affiant asked W-1 how he knows about "Mo's" temper if he does not know him. W-1 stated he has seen him get upset and do stuff, but then stated he "never hits them."

An older man walked up to your Affiant and W-1 and interrupted the interview. This man, W-5, had been seen in the home earlier and was identified as the "father-in-law," but without any identifying information as to which family member he was related. W-5 was asked about the Complainant to which he denied knowing anything about her whereabouts or condition. W-5 was asked about a man named "Maurice or Mo," to which he also denied knowing. W-5 was later identified by W-1 as Suspect Maurice Menfield's father. This was also confirmed through previous reports with CSFA.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Maurice Menfield
Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

AFFIDAVIT'S SIGNATURE:

SUBSCRIBED AND SWORN BEFORE ME THIS DAY OF , 2020

JUDGE/DEPUTY CLERK, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-29-06
Superior Court of the District of Columbia  
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT  
USW NO.:

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<th>Menefield, Maurice</th>
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| SEX: | M |
| RACE: | Black |
| DOB: | 02/06/92 |
| HGT: | 6'0" |
| WGT: | 160 |
| EYES: | BRO |
| HAIR: | Brown |
| COMPL: | Medium |
| SCARS, MARKS, TATTOOS: | N/A |

| DEFENDANT'S HOME ADDRESS: | 517 Harvard Street, NW, #A, Washington, D.C., 20001 |
| DEFENDANT'S BUSINESS ADDRESS: | N/A |
| COMPLAINT'S NAME: | L.D. (2-year-old-female) |
| LOCATION OF OFFENSE: | 517 Harvard Street, NW, #A, Washington, D.C., 20001 |
| DATE OF OFFENSE: | December 22, 2020 |
| TIME OF OFFENSE: | Multiple hours |

CAUTION AND MEDICAL CONDITIONS (CMC)  
Select a valid CMC code below for each medical condition.

- 00 = Arson or toddlers  
- 05 = Violent Tendency  
- 10 = Marital Arts Expert  
- 20 = Sexually Violent Predator  
- 60 = Known to abuse drugs  
- 65 = Epilepsy  
- 66 = Other  
- 68 = Medication Required  
- 70 = Suicide  
- 75 = Other  
- 80 = Explosive Expertise

The 9 year old female (W-2) and the 8 year old female (W-3) also made no disclosures regarding abuse.  
The 5 year old female (W-4) stated that the Complainant’s face was “bloody” and touched both of her cheeks  
with her hands, rubbing up and down. W-4 stated “Mo” hurt the Complainant and that she does not like him. W-4  
advised that “Mo” is a “DooDoo Head.” Due to commotion in the residence, Det. Your Affiant stopped  
interviewing the children and then followed up with W-1 and W-4.

Your Affiant conducted a second interview with W-4 in the kitchen. The Complainant’s mother would not let  
your Affiant speak with W-4 unless W-1 stood in the entrance of the kitchen. W-4 advised that the Complainant  
had blood on her lips and “Mo” hit her. W-4 advised that the Complainant was with “Mo.” As your Affiant was  
speaking with W-4, W-1 came by the oven and overheard part of the conversation. W-1 told W-4 to keep talking  
and tell your Affiant “everything.” At this point, your Affiant asked W-1 if he would be willing to talk again and  
he agreed to do it if he could do it while preparing food so his mother would not know they were talking.

Your Affiant conducted a second interview with W-1. W-1 advised that yesterday his mother was at the dentist  
with W-3 and he heard Suspect Maurice Menefield hitting and kicking the Complainant in his mother’s  
bedroom. W-1 advised that the Complainant was bleeding from her face and appeared injured. W-1 stated that

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Maurice Menefield
Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

AFFIANT'S SIGNATURE:

SUBSCRIBED AND SWORN BEFORE ME THIS ___21___ DAY OF __DECEMBER__, 2020

(JUDGE) DEPUTY CLERK, SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD(17)-1050  
Revision Date: 12-29-06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

Defendant's Name: Maurice Meniefieled
Nickname: Mo
Aliases: N/A
CCN: 20-18-1568
PID: DC 586071

Sex: Male
Race: Black
DOB: 02/06/92
Height: 6'0"
Weight: 160 lbs
Eye: Brown
Hair: Brown
Complexion: Medium
Scars, Marks, Tattoos: N/A

Defendant's Home Address:
517 Harvard Street, NW, #A, Washington, D.C., 20001
Telephone Number: (620) 474-5840

Defendant's Business Address:
N/A
Telephone Number: N/A

Complainant's Name:
L.D. (2-year-old-female)

Location of Offense:
517 Harvard Street, NW, #A, Washington, D.C., 20001
Date of Offense: December 22, 2020
Time of Offense: Multiple hours

Caution and Medical Conditions (CMO)

Select a valid CMO code below for wanted person when using the caution indicator.

- 00 Armed and Dangerous
- 05 Homeless
- 55 Alcoholic
- 61 Other
- 70 Suicidal
- 05 Violent Tendencies
- 90 Diabetic
- 40 Allergies
- 65 Epilepsy
- 80 Medication Required
- 10 Martial Arts Expert
- 50 Heart Condition
- 20 Known to abuse drugs
- 25 Escape Risk
- 15 Explosive Expertise

Give a brief description of what happened:

Suspect Maurice Meniefieled started to abuse his mother as soon as she got home and showed your Affiant a folding metal shopping cart (for laundry or groceries) in the backyard and advised that Suspect Maurice Meniefieled threw the cart at her mother's head, striking her. W-1 then stated Suspect Maurice Meniefieled struck his mother in the head with a metal sauce pan. W-1 stated Suspect Maurice Meniefieled locked her in the backyard then came inside the house and punched the Complainant in the abdomen and told her to get their coats because they were going to Howard Hospital to see their mother. W-1 stated that his mother had been hit by a car. W-1 advised that “Mo” had taken the Complainant, but did not know where. W-1 advised that “Mo” has choked his mother before and threatened to “kill her” both on December 22nd, 2020 and on previous occasions. Due to the lack of privacy and for W-1’s safety, the interview was stopped.

Your Affiant requested 3rd District Patrol units to respond 517 Harvard Street, NW, #A, Washington, D.C. to assist with a CFSA removal of four (4) children. Patrol units responded, as well as, an additional CFSA Social Worker. All four (4) children were taken into CFSA's custody.

Complainant:

Your Affiant received information from CFSA that Suspect Maurice Meniefieled was possibly at 1215 49th Street.

Affiant's Signature:

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefieled

Charge: First Degree Cruelty to Children

Assistant United States Attorney

Form CD (77-1050) Revision Date: 11-23-05

Signature and Swoon Before Me This Day Of ___________________________ 2020

SIGNED AND SWORN BEFORE ME THIS DAY OF ___________________________ 2020

JUDICIAL DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
<thead>
<tr>
<th>DEFENDANT'S NAME:</th>
<th>Meniefield, Maurice</th>
<th>NICKNAME:</th>
<th>Mo</th>
</tr>
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<tbody>
<tr>
<td>SEX:</td>
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<td>DOB:</td>
<td>02/06/92</td>
<td>HOT: 6'0&quot;</td>
<td>WGT: 160</td>
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<tr>
<td>EYES:</td>
<td>BRO</td>
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<td>SCARS, MARKS, TATTOOS:</td>
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<td>COMPL:</td>
<td>Medium</td>
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<tr>
<td>ADDRESS:</td>
<td>517 Harvard Street, NW, #A, Washington, D.C., 20001</td>
<td>TELEPHONE NUMBER:</td>
<td>(620) 474-8540</td>
</tr>
<tr>
<td>ADDRESS:</td>
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<tr>
<td>COMPLAINANT'S NAME:</td>
<td>L.D. (2-year-old-female)</td>
<td>DATE OF OFFENSE:</td>
<td>December 22, 2020</td>
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<tr>
<td>LOCATION OF OFFENSE:</td>
<td>517 Harvard Street, NW, #A, Washington, D.C., 20001</td>
<td>TIME OF OFFENSE:</td>
<td>Multiple hours</td>
</tr>
</tbody>
</table>

CAUTION AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for wanted person when using the caution indicator.
- 00 = Armed and Dangerous
- 85 = Homosexual
- 65 = Violent Tendencies
- 60 = Alcohol
- 60 = Allergies
- 40 = Diabetic
- 20 = Known to use drugs
- 01 = Other
- 01 = Epilepsies
- 00 = Medication Required
- 00 = Heart Condition
- 00 = Antibiotic
- 00 = Expiration Date
- 20 = Explosive Explosive
- 50 = Explosive Propellant
- 70 = Explosive

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

NE, Washington, D.C. Detectives responded to the location and made contact with W-6. As MPD Detectives arrived on scene, 5th District Officers also arrived on scene and advised they received a “Check on the Welfare” call for the same location (CCNs 20-181546). Apartment #204 had Meniefield written on the door. W-6 advised that suspect Maurice Meniefield’s sister, Defendant Quanice Meniefield, was not home and she was at a doctor’s appointment. W-6 stated there were children in the residence, but they were only Defendant Quanice Meniefield’s children and he would not allow them to open the door until she came home. W-6 stated suspect Maurice Meniefield had gone to the store.

Your Affiant met all parties at 1215 49th Street, NE, Washington, D.C. and shortly after arriving, Defendant Quanice Meniefield arrived at her residence. Defendant Quanice Meniefield was advised of the circumstances and first refused to open the door and started walking down the street, crying. Defendant Quanice Meniefield then agreed to let MPD enter her home using her key. MPD made entrance to apartment #204 with the consent of Defendant Quanice Meniefield. The living room, kitchen, and bathroom had no lights on and no one was in any of those rooms. Your Affiant and a Detective Official checked the first bedroom, which appeared to be a child’s room, and it was empty. Your Affiant and a Detective Official entered the last bedroom and observed two male children sitting at a small table by a bed. While stating commands for anyone else to come out and make

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefield

Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 24TH DAY OF DECEMBER 2020

JUDGE DEPUTY CLERK \ SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 12-09-20
Affidavit in Support of an Arrest Warrant

<table>
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<tr>
<td>Height:</td>
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<tr>
<td>Complexion:</td>
<td>Medium</td>
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<td>SCARS, MARKS, TATTOOS:</td>
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<tr>
<td>Defendant's Home Address:</td>
<td>517 Harvard Street, NW, #A, Washington, D.C., 20001</td>
</tr>
<tr>
<td>Telephone Number:</td>
<td>(630) 474-5840</td>
</tr>
<tr>
<td>Defendant's Business Address:</td>
<td>N/A</td>
</tr>
<tr>
<td>Complainant's Name:</td>
<td>L.D. (2-year-old-female)</td>
</tr>
<tr>
<td>Telephone Number:</td>
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</tr>
<tr>
<td>Location of Offense:</td>
<td>517 Harvard Street, NW, #A, Washington, D.C., 20001</td>
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<tr>
<td>Date of Offense:</td>
<td>December 22, 2020</td>
</tr>
<tr>
<td>Time of Offense:</td>
<td>Multiple hours</td>
</tr>
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Caution and Medical Conditions (CMC)

Select a valid CMC code below for wanted person when using the caution indicator.

- 0 = Armed and Dangerous
- 05 = Resistant
- 06 = Violent Tendency
- 09 = Diabetic
- 60 = Allergies
- 65 = Epilepsy
- 78 = Known to abuse drugs
- 25 = Escape Risk
- 13 = Explosive

Give a Brief Description of What Happened:

themselves known, a young male child appeared from under the bed and then the Complainant popped her head out from under the bed.

Your Affiant helped pull the Complainant out from under the bed. The Complainant had severe swelling to her entire face (forehead, cheeks, lips, and throat) and a COVID-19 mask initially covering her mouth. Your Affiant removed the mask and it had a large spot of fresh blood inside. The Complainant's entire mouth was bloody and blood was coming out of her mouth, falling on the bed and her clothing. There were abrasions on both of the Complainant's cheeks. The Complainant had tears in her eyes and streaming down her face, but did not make any sounds. Yet. Your Affiant did a quick body scan of the Complainant and found severe bruising, abrasions, and swelling on the Complainant's chest and stomach area. Your Affiant requested for an ambulance to be called to the scene. DCFEMS Engine 27 and Ambulance 30 responded to the scene.

Arrest of Guanie Menifee

Your Affiant advised a Detective Official that Defendant Guanie Menifee was being arrested for having a severely injured child in her house for approximately 24-hours. A MPD Detective Official placed Defendant

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Maurice Menifee
Charge With: First Degree Cruelty to Children
ASSISTANT UNITED STATES ATTORNEY

Signature:

Subscribed and Sworn Before Me This 24th Day of December 2020

Defendant

Assistant United States Attorney
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

Defendant's Name: Menziefield, Maurice

Address: 517 Harvard Street, NW, #A, Washington, D.C., 20001

DATE OF OFFENSE: December 22, 2020

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:
Maurice Menziefield
Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

Exhibit A p. 011
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
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<th>DEFENDANT'S NAME:</th>
<th>Maurice Meniefield</th>
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<td>ALIASES:</td>
<td>N/A</td>
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<td>20-181568</td>
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<td>PDID:</td>
<td>DC 586071</td>
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<th>SEX: M</th>
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<th>DOB: 02/06/92</th>
<th>HGT: 6'0&quot;</th>
<th>WGT: 160</th>
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<th>HAIR: Brown</th>
<th>COMPL: Medium</th>
<th>SCARS, MARKS, TATTOOS</th>
</tr>
</thead>
</table>

DEFENDANT'S HOME ADDRESS:
517 Harvard Street, NW, #A, Washington, D.C., 20001

DEFENDANT'S BUSINESS ADDRESS:
N/A

COMPLAINANT'S NAME:
L.D. (2-year-old-female)

LOCATION OF OFFENSE:
517 Harvard Street, NW, #A, Washington, D.C., 20001

DATE OF OFFENSE: December 22, 2020
TIME OF OFFENSE: Multiple hours

TELEPHONE NUMBER:
(202) 474-5840

TELEPHONE NUMBER:
N/A

CAUTION AND MEDICAL CONDITIONS

Select a valid CMC code below for wanted person when using the caution indicator.
- 01 = Armed and Dangerous
- 05 = Homosexual
- 55 = Alcoholic
- 60 = Other
- 65 = Satisfied
- 70 = Suicidal
- 80 = Medication Required
- 85 = Other
- 90 = Diabetic
- 95 = Violent Tendencies
- 10 = Mental Health Expert
- 25 = Escape Risk
- 30 = Sexually Violent Predator
- 50 = Heart Condition
- 60 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

ribs (rib 7, 8, 9 on her left side and rib 8, 9 on her right side). The Complainant had multiple contusions to her right kidney, which the doctor indicated meant there was internal bleeding within her kidney and swelling. The Complainant had a liver injury as well and the results were pending as to if she had a laceration to her liver and internal bleeding in the area. It was unknown if the Complainant was missing any teeth because the doctors were unable to manipulate her mouth and jaw in a way to check before surgery. The Complainant was put in a neck and head brace and it was stated she would be in the hospital for the remainder of the week.

ADDITIONAL INTERVIEWS WITH SIBLINGS

As your Affiant was at the hospital with the Complainant, CFSA arrived with the four (4) siblings for child abuse evaluations. Your Affiant responded to the lobby and advised the children that their sister was located, hurt, but “Okay,” and that they were going to be evaluated in a room near her and be able to see the Complainant. W-1 and W-4 started to cry. W-1 asked your Affiant if the Complainant was found at Defendant Quanice Meniefield’s house and then another unknown location. Your Affiant asked W-1 why he asked about those locations and she/he advised that that is where Suspect Maurice Meniefield goes to “hide.” W-1 asked your Affiant if he could talk because he was ready to tell the “whole truth” now.

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefield

Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

AFFIANT'S SIGNATURE:

SUBSCRIBED AND SWORN BEFORE ME THIS 21

DAY OF ___________ 2020

JUDGE (SIGNED BY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CR(17)-1050 Revision Date: 11-24-06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME:

Meniefield, Maurice

NICKNAME:

Mo

ALIASES:

N/A

SEX:

M

RACE:

Black

DOB:

02/06/92

HGT:

6'0"

WGT:

160

EYES:

Bro

HAIR:

Brown

COMPL:

Medium

SCARS, MARKS, TATTOOS:

N/A

DEFENDANT'S HOME ADDRESS:

517 Harvard Street, NW, #A, Washington, D.C., 20001

TELEPHONE NUMBER:

(603) 473-5840

DEFENDANT'S BUSINESS ADDRESS:

N/A

TELEPHONE NUMBER:

N/A

COMPLAINANT'S NAME:

L.D. (2-year-old-female)

DATE OF OFFENSE:

December 22, 2020

LOCATION OF OFFENSE:

517 Harvard Street, NW, #A, Washington, D.C., 20001

TIME OF OFFENSE:

Multiple hours

Select a valid CMC code below for wanted person when using the caution indicator.

00 = Armed and Dangerous
85 = Hemophiliac
85 = Alcoholic
91 = Other
66 = Allergies
65 = Epileptic
90 = Medication Required
10 = Martial Arts Expert
50 = Heart Condition
20 = Known to abuse drugs
25 = Escape Risk
30 = Severely Violent Predator

Give a brief description of what happened:

Your Affiant and a Detective Official conducted an interview with W-1 in a private room. W-1 stated his mother had told him to not tell about the abuse because Suspect Maurice Meniefield is on "parole." W-1 advised he was worried about his mother being alone in the house because Suspect Maurice Meniefield might hurt her or kill her. W-1 stated on December 22nd, 2020, his mother took W-3 to the dentist. The Complainant urinated on the bed and Suspect Maurice Meniefield became upset and he heard what sounded like the Complainant being thrown against the wall. W-1 advised he later cleaned up a large amount of blood from the wall in his mother's room. W-1 advised he could hear what sounded like slapping or punching and kicking. W-1 stated he heard the Complainant crying. W-1 advised he also heard a whipping sound and later saw that Suspect Maurice Meniefield had cut the TV cord and must have used that to whip the Complainant.

W-1 advised the abuse momentarily ceased and the Complainant walked out of the bedroom, bleeding from her face. W-1 advised Suspect Maurice Meniefield had him get a black washcloth that was now somewhere in the house soaked in blood and put it in the child's mouth to stop the bleeding. W-1 advised that he did do this. W-1 stated his mother arrived home with W-3 shortly after this. W-1 stated Suspect Maurice Meniefield immediately "got in" his mother's face by the front door and started to verbally abuse her. Suspect Maurice Meniefield continued to harass and yell at the Complainant's mother while she questioned why he was mad at her. Suspect

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefield

Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

USW NO.:

20-181585

PDD:

DC 586071

21

2020

SUBSCRIBED AND SWORN BEFORE ME THIS__

JUDGE (DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 1-20-06
Exhibit A p. 014

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Meniefield, Maurice

NICKNAME: Mo

ALIASES: N/A

CCN: 20-191568

PDID: DC 586071

SEX: M
RACE: Black
DOB: 02/06/92
HGT: 6'0
WT: 160
EYES: BRO
HAIR: Brown
COMPL: Medium
SCARS, MARKS, TATTOOS: N/A

DEFENDANT'S HOME ADDRESS: 517 Harvard Street, NW, #A, Washington, D.C., 20001

TELEPHONE NUMBER: (623) 474-5840

DEFENDANT'S BUSINESS ADDRESS: N/A

TELEPHONE NUMBER: N/A

COMPLAINANT'S NAME: L.D. (2-year-old-female)

DATE OF OFFENSE: December 22, 2020

TIME OF OFFENSE: Multiple hours

LOCATION OF OFFENSE: 517 Harvard Street, NW, #A, Washington, D.C., 20001

CAUTION AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for wanted person when using the caution indicator.

- 00 - Armed and Dangerous
- 05 - Violent
- 10 - Martial Arts Expert
- 20 - Sexual Violent Predator
- 30 - Other
- 35 - Researcher
- 40 - Nuclear Worker
- 45 - Heroin Addict
- 50 - HIV Positive
- 55 - AIDS
- 60 - Diabetic
- 65 - Epilepsy
- 70 - Schizophrenia
- 75 - Psychotic
- 80 - Medication Required
- 90 - Blind
- 95 - Hearing Impaired
- 99 - Other

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Maurice Meniefield and the Complainant's mother continued to argue and they ended up in the backyard. W-1 witnessed Suspect Maurice Meniefield pick up a metal folding grocery/laundry cart and throw it at the Complainant's mother, striking her in the head. W-1 advised he actually threw two carts at her and the hit her in the head with a saucepan. W-1 stated Suspect Maurice Meniefield then locked the Complainant's mother outside the house, walked into the house, punched the Complainant really hard in the stomach/chest, and told them all to get their coats because "their mother was doing stupid shit" and they had to go to the hospital. W-1 described the Complainant's whole body tensing up and stated she looked stiff and like she could not breathe. W-1 asked your Affiant if the Complainant was able to breathe when they were still in the lobby and then explained it was because of this punch.

W-1 advised that as they all walked to Howard University Hospital, Suspect Maurice Meniefield was holding the Complainant and would hold her in the air and yell at her and then he would hear slapping sounds. W-1 advised that once they got by the entrance of the hospital, Suspect Maurice Meniefield kept going with the Complainant and left them at the hospital. W-1 advised the hospital's security notified his/her mother and the Complainant's mother left the hospital with an IV in her arm and sticky things on her. W-1 stated as they walked back to the house, he told the Complainant's mother that Suspect Maurice Meniefield took the Complainant and she was

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefield
Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 2Y DAY OF 2020

(JUDGE, SHERIFF CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Form CR(19)-2000

Revision Date: 11-26-06
Exhibit A p. 015

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
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<th>Menifield, Maurice</th>
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<tr>
<td>NICKNAME:</td>
<td>Mo</td>
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<td>ALIASES:</td>
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<td>DC 586071</td>
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<tr>
<td>TELEPHONE NUMBER:</td>
<td>(620) 474-5840</td>
</tr>
<tr>
<td>DEFENDANT'S HOME ADDRESS:</td>
<td>517 Harvard Street, NW, #A, Washington, D.C., 20001</td>
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<tr>
<td>DEFENDANT'S BUSINESS ADDRESS:</td>
<td>N/A</td>
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<td>COMPLAINT'S NAME:</td>
<td>L.D. (2-year-old-female)</td>
</tr>
<tr>
<td>TELEPHONE NUMBER:</td>
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<tr>
<td>LOCATION OF OFFENSE:</td>
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<tr>
<td>DATE OF OFFENSE:</td>
<td>December 22, 2020</td>
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<td>TIME OF OFFENSE:</td>
<td>Multiple hours</td>
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</table>

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the color indicator.

- 00 = Armed and Dangerous
- 05 = Violent Tendencies
- 06 = Addict
- 07 = Alcohol
- 08 = Other
- 10 = Known to abuse drugs
- 20 = Escape Risk
- 30 = Sexually Violent Predator
- 35 = Served
- 40 = Diabetic
- 45 = HIV
- 50 = Heart Condition
- 55 = Epilepsy
- 60 = Allergies
- 65 = Epilepsy
- 70 = Medication Required
- 75 = Explosive

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

really hurt. W-1 advised that the Complainant’s mother called Defendant Quanie Menifield crying and asked if she knew what had happened and where the Complainant was. W-1 advised they were told the Complainant was with Suspect Maurice Menifield, but in Virginia. W-1 stated that Suspect Maurice Menifield came back over to 517 Harvard Street, NW, #A, Washington, D.C. later that evening and engaged in a physical fight with his uncles. W-1 stated that Suspect Maurice Menifield hid upstairs and then snuck out the back door when Police were on scene or before they got there. W-1 advised that one of his uncles went to jail.

W-1 stated Suspect Maurice Menifield caused the injury to his hand by hitting his hand with a microphone. W-1 had open cuts on multiple knuckles. W-1 disclosed that Suspect Maurice Menifield hits him all the time and has left bruises on him and a large knot on the back of his head before. W-1 stated Suspect Maurice Menifield has hit and kicked all his siblings before and chokes his mother often. W-1 advised that one time a chair was broken over his head by Suspect Maurice Menifield. W-1 stated the abuse often occurs as Suspect Maurice Menifield is just walking by one of the children and randomly decides to hit, punch, or kick them.

CUSTODIAL INTERVIEW WITH DEFENDANT QUANICE MENIFIELD

On December 24, 2020, a MPD Detective and Detective Official conducted a custodial video recorded interview

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Maurice Menifield
Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBER AND SWORN BEFORE ME THIS 21
DAY OF 2020

(JUDGE, DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Form CD(17)-1040
Revision Date: 11-29-09
**Superior Court of the District of Columbia**  
**CRIMINAL DIVISION**

**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**  
**USW NO.:**

<table>
<thead>
<tr>
<th>DEFENDANT'S NAME:</th>
<th>Nickname:</th>
<th>Aliases:</th>
<th>CCN:</th>
<th>PDID:</th>
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<tbody>
<tr>
<td>Meniesfield, Maurice</td>
<td>Mo</td>
<td>N/A</td>
<td>22-181555</td>
<td>DC 586071</td>
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<tr>
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<td>02/06/92</td>
<td>6'0&quot;</td>
<td>180</td>
<td>BRO</td>
<td>Brown</td>
<td>Medium</td>
<td>N/A</td>
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</tbody>
</table>

DEFENDANT'S HOME ADDRESS:  
517 Harvard Street, NW, #A, Washington, D.C., 20001  
TELEPHONE NUMBER:  
(202) 474-5840

DEFENDANT'S BUSINESS ADDRESS:  
N/A  
TELEPHONE NUMBER:  
N/A

COMPLAINANT'S NAME:  
L.D. (2-year-old-female)  
TELEPHONE NUMBER:  
N/A

LOCATION OF OFFENSE:  
517 Harvard Street, NW, #A, Washington, D.C., 20001  
DATE OF OFFENSE:  
December 22, 2020  
TIME OF OFFENSE:  
Multiple hours

CAUTION AND MEDICAL CONDITIONS (C&M):  
Select a valid C&M code below for each condition checked:
- _63_ = Arson and Dangerous  
- _64_ = Narcotic  
- _65_ = Alcohol  
- _66_ = Other  
- _67_ = Seizure  
- _68_ = Medication Required

LOCATION OF OFFENSE:  
517 Harvard Street, NW, #A, Washington, D.C., 20001  
DATE OF OFFENSE:  
December 22, 2020  
TIME OF OFFENSE:  
Multiple hours

CAUTION AND MEDICAL CONDITIONS (C&M):  
Select a valid C&M code below for each condition checked:
- _63_ = Arson and Dangerous  
- _64_ = Narcotic  
- _65_ = Alcohol  
- _66_ = Other  
- _67_ = Seizure  
- _68_ = Medication Required

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

of Defendant Quantice Meniesfield. Defendant Quantice Meniesfield waived her rights and participated in an interview.

During the interview, Defendant Quantice Meniesfield initially reported she wasn't home when the Complainant was dropped off at her residence and that she hadn't seen the Complainant's injuries. Defendant Quantice Meniesfield reported she was at the doctor's office for an appointment. Defendant Quantice Meniesfield recanted that statement and reported her brother, who she identified as "Maurice," "Mo," brought the Complainant to her residence the previous day.

Defendant Quantice Meniesfield reported Suspect Maurice Meniesfield sent her a photograph of the Complainant, via message, on her phone. Defendant Quantice Meniesfield reported Suspect Maurice Meniesfield told her the Complainant's mother had hurt the Complainant and that he had hit her with a plastic cup. Defendant Quantice Meniesfield stated Suspect Maurice Meniesfield told her he "fucked up." Defendant Quantice Meniesfield reported the Complainant's mother caused the injury because the Complainant urinated on the bed.

Defendant Quantice Meniesfield reported Suspect Maurice Meniesfield brought the Complainant to her and she

TO: WARRANT CLERK  
PLEASE ISSUE A WARRANT FOR:  
Maurice Meniesfield  
Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

AFFIANT'S SIGNATURE:  

SUBSCRIBED AND SWORN BEFORE ME THIS 21st DAY OF December, 2020  
(JUDGE) REPORT CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Form CD(17)-4050  
Revision Date: 11-29-06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Meneziefield, Maurice
NICKNAME: Mo
ALIASES: N/A
CCN: 20-31558
PDID: DC 586071

SEX: M
RACE: Black
DOB: 02/06/92
HTG: 6'0"
WGT: 150
EYES: BRO
HAIR: Brown
COMPL: Medium
SCARS, MARKS, TATTOOS: N/A

DEFENDANT'S HOME ADDRESS: 517 Harvard Street, NW, #A, Washington, D.C., 20001
DEFENDANT'S BUSINESS ADDRESS: N/A

COMPLAINANT'S NAME: L.D. (2-year-old-female)
LOCATION OF OFFENSE: 517 Harvard Street, NW, #A, Washington, D.C., 20001
DATE OF OFFENSE: December 22, 2020
TIME OF OFFENSE: Multiple hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

- 00 = Acne and Acne follicles
- 05 = Allergic Reactions
- 06 = Angina
- 07 = Asthma
- 08 = Background Noise
- 09 = Bandit
- 10 = Bank Fraud
- 11 = Bank Robbery
- 12 = Bank Robbery
- 13 = Burglary
- 14 = Burglar
- 15 = Criminal Intent
- 16 = Criminal Mischief
- 17 = Criminal Mischief
- 18 = Cult Member
- 19 = Cult Member
- 20 = Cult Member
- 21 = Cult Member
- 22 = Cult Member
- 23 = Cult Member
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- 93 = Cult Member
- 94 = Cult Member
- 95 = Cult Member
- 96 = Cult Member
- 97 = Cult Member
- 98 = Cult Member
- 99 = Cult Member

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

attempted to care for her. Defendant Quanice Meneziefield placed ice on the Complainant's injured face and provided her with Motrin. Defendant Quanice Meneziefield told Suspect Maurice Meneziefield the Complainant needed to go to the hospital and he said he was going to take her and face the consequences afterward. Defendant Quanice Meneziefield reported Suspect Maurice Meneziefield left her residence and responded back to 517 Harvard Street, NW, #A, Washington, D.C. Defendant Quanice Meneziefield reported she text the picture Suspect Maurice Meneziefield sent her to her other sibling. Defendant Quanice Meneziefield said this occurred prior to the fight Suspect Maurice Meneziefield was involved in at 517 Harvard Street, NE, Washington, D.C. with the Complainant's Uncle.

Defendant Quanice Meneziefield said Suspect Maurice Meneziefield returned to her residence the next morning and had asked about the Complainant's wellbeing. Defendant Quanice Meneziefield reported while Suspect Maurice Meneziefield was in her residence they were contacted by the Complainant's mother telling them that CFSA was at her house asking questions about the Complainant. The Complainant's mother reported she told CFSA the Complainant was in Virginia at her father's residence. Defendant Quanice Meneziefield reported she offered to bring the Complainant back home to her mother's care and the mother told her "no."

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Maurice Meneziefield
Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBER AND SWORN BEFORE ME THIS 29 DAY OF December 2020

(JUDGE DECEDED) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Form CD(47)-1050
Revision Date: 11-29-06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Menefield, Maurice

SEX: M
RACE: Black
DOB: 02/06/92
HEIGHT: 6'0
WEIGHT: 160
EYES: BRO
HAIR: Brown
COMPL: Medium
SCARS, MARKS, TATTOOS: N/A

DEFENDANT'S HOME ADDRESS: 517 Harvard Street, NW, #A, Washington, D.C., 20001

TELEPHONE NUMBER: (620) 474-5840

DEFENDANT’S BUSINESS ADDRESS: N/A

DATE OF OFFENSE: December 22, 2020

LOCATION OF OFFENSE: 517 Harvard Street, NW, #A, Washington, D.C., 20001

TIME OF OFFENSE: Multiple hours

COMPLAINANT’S NAME: L.D. (2-year-old-female)

DATE OF COMPLAINT: December 22, 2020

TIME OF OFFENSE: Multiple hours

CAUTION AND MEDICAL CONDITIONS (CMC):
Select a valid CMC code below for wanted person when using the caution indicator.

- 50 = Armed and Dangerous
- 85 = Hemophilic
- 15 = Alcoholics
- 51 = Other
- 70 = Sundial
- 95 = Violent Tendencies
- 90 = Diabetic
- 60 = Allergies
- 65 = Epilepsy
- 89 = Medication Required
- 10 = Marital Arts Expert
- 50 = Heart Condition
- 20 = Known to abuse drugs
- 25 = Escape Risk
- 15 = Explosive Expertise

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Defendant Quaniece Menefield reported she didn’t tell her children to hide with the Complainant under the bed. Defendant Quaniece Menefield reported she was on her way home and her children called her via google duo and told her the police were outside the residence attempting to come in. Defendant Quaniece Menefield told her children not to let the Police in the household until she got there.

Regarding previous abuse, Defendant Quaniece Menefield stated she has seen the Complainant’s mother physically discipline the children, but has never seen marks or bruises on them.

ADDITIONAL INFORMATION

Your Affiant was advised by CFSA that the Complainant’s mother was spoken to over the phone and the Complainant’s mother made a statement similar to, “I didn’t know her face looked like that.” The Complainant’s mother then stated that Suspect Maurice Menefield had come over to her residence intoxicated and fell down the stairs while holding the Complainant. The Complainant’s mother advised as far as she was told, the Complainant was somewhere in Virginia. The Complainant’s mother admitted to not FaceTiming with the Complainant within the last 24-hours.

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:
Maurice Menefield
Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

JURY (DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revised Date: 11-09-05
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Meniefeld, Maurice
NICKNAME: Mo
ALIASES: N/A
CCN: 20-1121593
PDID: DC 586071

SEX: M
RACE: Black
DOB: 02/06/92
HGT: 6'0"
WGT: 160
EYES: BRO
HAIR: Brown
COMPL: Medium
SCARS, MARKS, TATTOOS: N/A

DEFENDANT'S HOME ADDRESS:
517 Harvard Street, NW, #A, Washington, D.C., 20001
TELEPHONE NUMBER:
(630) 474-3844

DEFENDANT'S BUSINESS ADDRESS:
N/A
TELEPHONE NUMBER:
N/A

COMPLAINANT'S NAME:
L.D. (2-year-old-female)
TELEPHONE NUMBER:
N/A

LOCATION OF OFFENSE:
517 Harvard Street, NW, #A, Washington, D.C., 20001
DATE OF OFFENSE:
December 22, 2020
TIME OF OFFENSE:
Multiple hours

CAUTION AND MEDICAL CONDITIONS (CMO)
Select a valid CMO code below for listed person when using caution indicator.

__ 00 = Armed and Dangerous
__ 05 = Violent Tendencies
__ 10 = Martial Arts Expert
__ 15 = Explosive Expert
__ 20 = Known to abuse drugs
__ 25 = Escape Risk
__ 30 = Sexually Violent Predator
__ 35 = Humiliating
__ 40 = Allergies
__ 45 = Anorexia
__ 50 = Heart Condition
__ 51 = Other
__ 55 = Alcohol
__ 60 = Diabetic
__ 65 = Epilepsy
__ 66 = Seizure
__ 70 = Suicide
__ 75 = Medication Required

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

CONCLUSION
Based on the above set of facts and circumstances, your affiant believes that probable cause exists to issue an arrest warrant in the name of Maurice Meniefeld, the listed named defendant.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Maurice Meniefeld
Change With: First Degree Child Abuse

ASSISTANT UNITED STATES ATTORNEY

AFFIANT'S SIGNATURE:

SUBSCRIBED AND SWORN BEFORE ME THIS 21st DAY OF 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-29-20
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION

COMPLAINT

District of Columbia ss:

Defendant’s Name: Maurice Meniefield

Also Known As:

Address: 517 Harvard Street, NW Apt. A, Washington, DC

On or about December 22, 2020, within the District of Columbia, Maurice Meniefield, did intentionally, knowingly and recklessly torture, beat and otherwise willfully maltreat L.D., a child under 18 years of age, that is, about 2 years of age, and thereby caused bodily injury. (First Degree Cruelty to Children, in violation of 22 D.C. Code, Section 1101(a) (2001 ed.))

Co-Defendants:

Subscribed and sworn to before me this 24 day of December, 2020

WARRANT

To The United States Marshal or any other authorized federal officer or the Chief of Police of the District of Columbia:

WHEREAS the foregoing complaint and affidavit supporting the allegations thereof have been submitted, and there appearing probable cause and reasonable grounds for the issuance of an arrest warrant for

Maurice Meniefield

YOU ARE THEREFORE COMMANDED TO BRING THE DEFENDANT BEFORE SAID COURT OR OTHER PERSON ENUMERATED IN 18 U.S.C. 3041 forthwith to answer said charge.

Issued December 24, 2020

Title 16: □ Rule 105: □ Judge:

Sex: Male DOB: 02/06/1992 CCN: 20181568 PDID: 586071

Pawing Officer: Christine Bonaci Badge No.: D21563

OFFICER MUST EXECUTE RETURN

Officer’s Name: Date / Time: December 24, 2020

AUSA Signature:

NCIC APPROVED - AUSA SHARON MARCUS-KURN
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME:
ANDERSON, Tyra Monae

NICKNAME:

ALIASES:

CCN:
20-022611

PDID / FBE:
598660


DEFENDANT’S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2 TELEPHONE NUMBER: (202) 560-8014

DEFENDANT’S BUSINESS ADDRESS: TELEPHONE NUMBER:

COMPLAINANT’S NAME: M.A. TELEPHONE NUMBER: None

LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214 DATE OF OFFENSE: February 6, 2020 TIME OF OFFENSE: 14:42 Hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

- 00 = Armed and Dangerous - 25 = Escape Risk - 65 = Epilepsy - 01 = Other (Explain)
- 05 = Violent Tendencies - 30 = Sexually Violent Predator - 70 = Suicidal - 90 = Diabetic
- 10 = Martial Arts Expert - 50 = Heart Condition - 80 = Medication Required - 60 = Allergies
- 15 = Explosive Expertise - 55 = Alcoholic - 85 = Hemophilia - 20 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

On Thursday, February 6, 2020, at approximately 14:56 hours, members with the Fourth District, Metropolitan Police Department (MPD), were dispatched to Children’s National Medical Center (CNMC), located at 111 Michigan Avenue, NW, for a domestic violence report. An administrator at the CNMC had called 911 and reported that a deceased 11-month-old infant (M.A., date of birth 02/17/2019) was brought to the emergency room in a private vehicle, with signs of physical abuse. The caller stated that the mother (TYRA ANDERSON, hereinafter referred to as the DEFENDANT) was on the scene and would be detained until the Police arrived. They called the believed the death was a homicide. Once on the scene, MPD officers learned that M.A., hereinafter referred to as the decedent, had been driven to the CNMC from 1600 New York Avenue, NE (Quality Inn & Suites hotel) for medical treatment.

As is described below, the DEFENDANT was the parent and primary caregiver for the decedent. The decedent was in her exclusive care and custody for the week prior to her death and told medical personnel and law enforcement that the decedent fell from a bed on or about Monday, February 3, 2020, and began to have shaking episodes. The DEFENDANT stated that the next day, the decedent had a soft spot on her head and was gasping for air, yet the DEFENDANT did not seek medical care. In fact, upon reviewing available surveillance video footage, the last time the decedent was seen alive is on Saturday, February 1, 2020. There are multiple images of the DEFENDANT at the hotel with her 20-month-old child on Sunday, February 2, 2020, Monday, February 3, 2020 and Wednesday, February 5, 2020, but no sign of the decedent. On Thursday, February 6,

AFFIANT’S SIGNATURE:

x Chanel N. Howard

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

Form CD(37)-1020

SUBSCRIBED AND SWORN BEFORE ME THIS ____________________________________________

JUDGE (DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-20-06 Page 1 of 25
Superior Court of the District of Columbia  
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
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<tr>
<th>DEFENDANT’S NAME:</th>
<th>ANDERSON, Tyra Monae</th>
</tr>
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<td>NICKNAME:</td>
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<td>ALIASES:</td>
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<td>CCN:</td>
<td>20-022611</td>
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<td>PDID / FBE:</td>
<td>598660</td>
</tr>
</tbody>
</table>

| SEX: | F |
| RACE: | BLK |
| DOB:  | 1/29/1993 |
| HGT:  | 5’4 |
| WGT:  | 130 |
| EYES: | BRN |
| HAIR: | BLK |
| COMPL.: | DARK |
| SCARS, MARKS, TATTOOS: |                      |

| DEFENDANT’S HOME ADDRESS: |
| (LKA) 281 Newcomb Street SE, Apartment #2 |
| TELEPHONE NUMBER: |
| (202) 560-8014 |

| DEFENDANT’S BUSINESS ADDRESS: |
| TELEPHONE NUMBER: |
|                        |

| COMPLAINANT’S NAME: |
| M.A. |
| TELEPHONE NUMBER: |
| None |

| LOCATION OF OFFENSE: |
| 1600 New York Ave NE, Room# 214 |
| DATE OF OFFENSE: |
| February 6, 2020 |
| TIME OF OFFENSE: |
| 14:42 Hours |

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

<table>
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<tr>
<th></th>
<th>00 = Armed and Dangerous</th>
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<th>10 = Martial Arts Expert</th>
<th>15 = Explosive Expertise</th>
<th>25 = Escape Risk</th>
<th>30 = Sexually Violent Predator</th>
<th>50 = Heart Condition</th>
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<td>65 = Epilepsy</td>
<td>70 = Suicidal</td>
<td>80 = Medication Required</td>
<td>85 = Hemophilia</td>
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<td></td>
<td>01 = Other (Explain)</td>
<td>90 = Diabetic</td>
<td>60 = Allergies</td>
<td>20 = Known to abuse drugs</td>
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</table>

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

2020, the DEFENDANT is seen carrying what appears to be the decedent’s lifeless body before arriving at CNMC with the decedent wrapped in a blanket. (See Attachment A).

Based on the information contained in this affidavit, there is significant evidence that the DEFENDANT intentionally inflicted the decedent’s injuries and/or failed to seek immediate medical treatment, which created a grave risk of bodily harm to the decedent and which ultimately led to her death. Therefore, your affiant respectfully submits that probable cause exists that the DEFENDANT, Tyra Anderson, caused the decedent’s death. In addition, specifically, the DEFENDANT’s conduct constituted First Degree Cruelty to Children, a predicate offense to First Degree Felony Murder. Therefore, your affiant respectfully requests that an arrest warrant be issued charging the DEFENDANT, Tyra Anderson, with First Degree Felony Murder.

CNMC medical staff initiated life-saving measures but finding death apparent, Dr. Joanna Cohen pronounced the decedent dead at 14:42 hours. The decedent displayed contusions to the face and body, abrasions to the face, neck and hands, and discoloration to both legs. Dr. Cohen also indicated the death was caused by “non-accidental head trauma.” The decedent’s remains were transported to the Office of the Chief Medical Examiner (OCME) for the District of Columbia, where an autopsy was performed to determine the cause and manner of death.

TO: WARRANT CLERK

PLEASEISSUEAWARRANTFOR:

TYRA MONAE ANDERSON

Charge With First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

AFFIANT’S SIGNATURE:

x  Chanel N. Howard

SUBSCRIBED AND SWORN BEFORE ME THIS

12/01/20

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-20-06  Page 2 of 25
AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: ANDERSON, Tyra Monae

NICKNAME: 

ALIASES: 

CCN: 20-022611 

PDID / FBE: 598660 

SEX: F 

RACE: BLK 

DOB: 1/29/1993 

HGT: 5’4 

WGT: 130 

EYES: BRN 

HAIR: BLK 

COMPL: DARK 

SCARS, MARKS, TATTOOS 

DEFENDANT’S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2 

TELEPHONE NUMBER: (202) 560-8014 

DEFENDANT’S BUSINESS ADDRESS: 

TELEPHONE NUMBER: 

COMPLAINANT’S NAME: M.A. 

TELEPHONE NUMBER: None 

LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214 

DATE OF OFFENSE: February 6, 2020 

TIME OF OFFENSE: 14:42 Hours 

CAUTION AND MEDICAL CONDITIONS (CMC) 

Select a valid CMC code below for wanted person when using the caution indicator. 

____ 00 = Armed and Dangerous 

____ 05 = Violent Tendencies 

____ 10 = Martial Arts Expert 

____ 15 = Explosive Expertise 

____ 25 = Escape Risk 

____ 30 = Sexually Violent Predator 

____ 50 = Heart Condition 

____ 55 = Alcoholic 

____ 65 = Epilepsy 

____ 70 = Suicidal 

____ 80 = Medication Required 

____ 85 = Hemophilia 

____ 90 = Diabetic 

____ 91 = Other (Explain) 

____ 60 = Allergies 

____ 20 = Known to abuse drugs 

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED: 

A social worker at CNMC, hereinafter referred to as Witness One (W1), spoke with Tyra Anderson, hereinafter referred to as DEFENDANT, regarding the death. W1 reported that the DEFENDANT stated that she is the mother and primary caregiver of M.A. W1 documented that the DEFENDANT was “clearly distraught” when reporting that she and her four children have been living at the Quality Inn hotel since November 2019. The DEFENDANT stated that two of her children stay with family members so they can go to school and that the decedent had been healthy with no history of hospitalization, medications or conditions. In regards to the injury, the DEFENDANT reported that the decedent fell from a bed on Monday, that the decedent “falls often,” and that the decedent had a shaking episode that day. The decedent also had “shaking episodes” on Tuesday and Wednesday.

The DEFENDANT also told W1 that “after she [decedent] was dead I saw blood [bruise] pooling in her face and in her mouth. Isn’t that fucked up?”

The DEFENDANT reported to W1 that she has been diagnosed with anxiety and panic attacks and possibly bipolar disorder, but later stated she wasn’t sure about the bipolar diagnosis. The DEFENDANT has been prescribed several medications. W1 also noted that DEFENDANT stated that she “took pills” that morning and seemed fixated on getting her medications after the decedent was pronounced dead.

TO: WARRANT CLERK 

PLEASE ISSUE A WARRANT FOR: 

TYRA MONAE ANDERSON 

Charge With: First Degree Felony Murder (Cruelty to Children) 

ASSISTANT UNITED STATES ATTORNEY 

-- NCIC APPROVED -- 

AFFIANT’S SIGNATURE: x Chanel N. Howard

SUBSCRIBED AND SWORN BEFORE ME THIS _______ DAY OF __________, 20____

JUDGE (JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

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Exhibit B p. 004

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
<thead>
<tr>
<th>DEFENDANT'S NAME:</th>
<th>ANDERSON, Tyra Monae</th>
</tr>
</thead>
<tbody>
<tr>
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<td>COMPL:</td>
<td>DARK</td>
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<tr>
<td>SCARS, MARKS, TATTOOS:</td>
<td></td>
</tr>
</tbody>
</table>

DEFENDANT'S HOME ADDRESS:
(LKA) 281 Newcomb Street SE, Apartment #2

DEFENDANT'S BUSINESS ADDRESS:

COMPLAINANT'S NAME: M.A.

TELEPHONE NUMBER: None

LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214

DATE OF OFFENSE: February 6, 2020

TIME OF OFFENSE: 14:42 Hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.
00 = Armed and Dangerous
05 = Violent Tendencies
10 = Martial Arts Expert
15 = Explosive Expertise
25 = Escape Risk
30 = Sexually Violent Predator
50 = Heart Condition
55 = Alcoholic
65 = Epilepsy
70 = Suicidal
80 = Medication Required
85 = Hemophilia
90 = Diabetic
60 = Allergies
20 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Members of the Homicide Branch Special Victim's Unit were notified and responded to assume investigative responsibility. Your affiant spoke with the DEFENDANT to ascertain the circumstances of how the decedent sustained her injuries. The following events are as described by the DEFENDANT.

The DEFENDANT reported that the decedent, and her 20-month-old child have been in her care for at least the last week. On Monday, February 3, 2020, sometime in the afternoon, while inside 1600 New York Ave, NE #214, the decedent fell from a bed. The DEFENDANT was looking at her cellphone and the decedent tried to reach for something and fell. The decedent has fallen before, sometimes striking her head. The DEFENDANT started crying and “kind of” shook the decedent. The DEFENDANT said she performed chest and stomach compressions on the decedent. Later that day, the decedent started shaking, as if having a seizure. The DEFENDANT fed the decedent and put her to bed.

The DEFENDANT further reported that on Tuesday, February 4, 2020, the decedent was “not active and not acting like herself.” The decedent was no longer able to hold herself up or stand on her own. The DEFENDANT also reported that the decedent had a bump on her head and the side of her head was “soft like jello.”

The DEFENDANT reported that on Wednesday, February 5, 2020, at about 19:00 or 19:30 hours, she placed the decedent and her 20-month-old child in the bathtub and then went downstairs to get dinner from the cafeteria. The DEFENDANT stated that she was only out of the room for about five (5) minutes. The DEFENDANT came

AFFIANT'S SIGNATURE:  

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

SUBSCRIBED AND SWORN BEFORE ME THIS DAY OF 12/01/20
JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-20-06
Page 4 of 25
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

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<td>DEFENDANT'S HOME ADDRESS:</td>
<td>(LKA) 281 Newcomb Street SE, Apartment #2</td>
</tr>
<tr>
<td>DEFENDANT'S BUSINESS ADDRESS:</td>
<td></td>
</tr>
<tr>
<td>TELEPHONE NUMBER:</td>
<td>(202) 560-8014</td>
</tr>
<tr>
<td>COMPLAINANT'S NAME:</td>
<td>M.A.</td>
</tr>
<tr>
<td>TELEPHONE NUMBER:</td>
<td>None</td>
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<tr>
<td>LOCATION OF OFFENSE:</td>
<td>1600 New York Ave NE, Room# 214</td>
</tr>
<tr>
<td>DATE OF OFFENSE:</td>
<td>February 6, 2020</td>
</tr>
<tr>
<td>TIME OF OFFENSE:</td>
<td>14:42 Hours</td>
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CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

- 00 = Armed and Dangerous
- 05 = Violent Tendencies
- 10 = Martial Arts Expert
- 15 = Explosive Expertise
- 25 = Escape Risk
- 30 = Sexually Violent Predator
- 50 = Heart Condition
- 55 = Alcoholic
- 65 = Epilepsy
- 70 = Suicidal
- 80 = Medication Required
- 85 = Hemophilic
- 90 = Diabetic
- 91 = Other (Explain)
- 92 = Known to abuse drugs
- 93 = Allergies

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

back in the room and found the decedent in the tub, bent at the waist. The DEFENDANT called the decedent’s name and she “popped up.” The decedent was gasping for air. The DEFENDANT began chest and stomach compressions and observed water and foam coming from the decedent’s mouth and nose. The DEFENDANT started crying. The DEFENDANT dressed the decedent, gave her a bottle of milk and some food from the dinner tray. The decedent fell asleep.

The DEFENDANT further stated that on Thursday, February 6, 2020, at about 10:00 hours, she woke up and found the decedent, who she had been sleeping with, unresponsive and cold to the touch.

Initially, the DEFENDANT reported that she had a friend drive her to the hospital in her (DEFENDANT’s) vehicle. The friend left the hospital in the vehicle and took the DEFENDANT’s 20-month-old child to a family member’s home. When detectives asked why she would let someone take her car and leave her at the hospital, the DEFENDANT changed her story and stated that the vehicle actually belonged to the friend but it was unregistered.

The DEFENDANT eventually admitted that the decedent’s father picked them up from the hotel and drove them to the hospital. She stated that she was not honest about how she got to the hospital because the decedent’s father is barred from the hotel and she did not want to get him in trouble. The DEFENDANT reported that she didn’t seek immediate medical attention for the decedent because she was scared.

AFFIANT’S SIGNATURE:

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS ______________ 2020

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

-- NCIC APPROVED --
Exhibit B p. 006

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFFENDANT’S NAME:
ANDERSON, Tyra Monae

NICKNAME:

ALIASES:

CCN:
20-022611

PDID / FBE:
598660

SEX: F

RACE: BLK

DOB: 1/29/1993

HGT: 5’4

WGT: 130

EYES: BRN

HAIR: BLK

COMPL: DARK

SCARS, MARKS, TATTOOS

TELEPHONE NUMBER:
(202) 560-8014

TELEPHONE NUMBER:

COMPLAINANT’S NAME:
M.A.

TELEPHONE NUMBER:
None

LOCATION OF OFFENSE:
1600 New York Ave NE, Room# 214

DATE OF OFFENSE:
February 6, 2020

TIME OF OFFENSE:
14:42 Hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

| 00 | Armed and Dangerous |
| 05 | Violent Tendencies |
| 10 | Martial Arts Expert |
| 15 | Explosive Expertise |
| 25 | Escape Risk |
| 30 | Sexually Violent Predator |
| 50 | Heart Condition |
| 55 | Alcoholic |
| 65 | Epilepsy |
| 70 | Suicidal |
| 80 | Medication Required |
| 85 | Hemophiliac |
| 90 | Diabetic |
| 60 | Allergies |
| 20 | Known to abuse drugs |

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Based on the lapse in time from the injury to the death, a member of the Homicide Branch applied for a D.C. Superior Court Search Warrant for 1600 New York Ave, NE, room #214. Your affiant and a member of MPD’s Fourth District gave the DEFENDANT a ride to the Homicide Branch to wait for the warrant to be approved. While en route to the office, the DEFENDANT talked about how happy the decedent was and that she (decedent) had a bright smile. The DEFENDANT stated the decedent was a happy baby. In contrast, the DEFENDANT also referred to the decedent as greedy and lazy. Your affiant asked the DEFENDANT why she would refer to her child like that and she stated “because that’s all she do is eat and sit around.”

Prior to arriving at the Homicide Branch, the DEFENDANT asked your affiant if she needed a lawyer or if we (Police) were going to seize her clothes. The DEFENDANT then asked if your affiant thought she needed a lawyer. Your affiant told the DEFENDANT that if I really thought she needed a lawyer, I’d have told her (or words to that effect). Your affiant told the DEFENDANT that her help was needed to explain and understand the decedent’s injuries. The DEFENDANT stated she thought people who spoke to detectives needed a lawyer because she saw it on television.

While at the Homicide Branch, the DEFENDANT provided biographical information on the decedent and her other children and spoke about her own mental health issues. As time passed, the DEFENDANT asked if she could leave. Your affiant told DEFENDANT that she was free to leave but we still needed her help to reconstruct the events over the past few days. The DEFENDANT stated that she wanted to walk to a nearby convenience store.

AFFIANT’S SIGNATURE:

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS ____________________________

JUDGE (DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

-- NCIC APPROVED --

Form CD(17)-1020

Revision Date: 11-20-06
Page 6 of 25
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

| DEFENDANT'S NAME: | ANDERSON, Tyra Monae |
| NICKNAME: | |
| ALIASES: | |
| CCN: | 20-022611 |
| PDID / FBE: | 598660 |

| SEX: | F |
| RACE: | BLK |
| DOB: | 1/29/1993 |
| HGT: | 5'4 |
| WGT: | 130 |
| EYES: | BRN |
| HAIR: | BLK |
| COMPL.: | DARK |
| SCARS, MARKS, TATTOOS: | |
| TELEPHONE NUMBER: | (202) 560-8014 |

| DEFENDANT'S HOME ADDRESS: | (LKA) 281 Newcomb Street SE, Apartment #2 |
| DEFENDANT'S BUSINESS ADDRESS: | |
| TELEPHONE NUMBER: | |

| COMPLAINANT'S NAME: | M.A. |
| TELEPHONE NUMBER: | None |

| LOCATION OF OFFENSE: | 1600 New York Ave NE, Room# 214 |
| DATE OF OFFENSE: | February 6, 2020 |
| TIME OF OFFENSE: | 14:42 Hours |

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

| 00 = Armed and Dangerous | 25 = Escape Risk | 65 = Epilepsy | 01 = Other (Explain) |
| 05 = Violent Tendencies | 30 = Sexually Violent Predator | 70 = Suicidal | 90 = Diabetic |
| 10 = Martial Arts Expert | 50 = Heart Condition | 80 = Medication Required | 60 = Allergies |
| 15 = Explosive Expertise | 55 = Alcoholic | 85 = Hemophilia | 20 = Known to abuse drugs |

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

store and would return when detectives were ready to go back to the hotel. The DEFENDANT left the Homicide Branch and did not return.

Later that evening, a D.C. Superior Court Search Warrant was approved by the Honorable Judge Maribeth Raffin for 1600 New York Ave, NE #214, to assist with the death investigation. Members of the D.C. Department of Forensic Sciences (DFS) documented and photographed room #214. Multiple items were collected, to include a pink and white baby walker, a white bed sheet, and a piece of fabric from the bed skirt.

Later that day, members of the Homicide Branch interviewed the decedent’s father at his residence. The father reported that the DEFENDANT called him and asked him to take her to the hospital because the decedent was “acting funny.” The decedent’s father responded to the hotel and picked up the DEFENDANT, their 20-month-old child and the decedent. The father observed that the decedent was wrapped in a blanket. The father stated that he also observed a scratch on the decedent’s face but assumed it happened when the decedent was playing with one of her sisters. The father stated that their 20-month-old child and that the decedent fought. The decedent’s father reported that the decedent has previously fallen from a bed on three to four occasions. The father also stated that he did not see the abrasions on the decedent’s hand.

The decedent’s father stated he has not been alone with his children since he was barred from the hotel 2-3 weeks ago (prior to the death). Your affiant reports that the decedent’s father had been barred from the Quality

AFFIANT’S SIGNATURE: [Signature]

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

--- NCIC APPROVED ---

SUBSCRIBED AND SWORN BEFORE ME THIS ___/___/___

JUDGE (DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Page 7 of 25
Superior Court of the District of Columbia  
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

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<th>DEFENDANT’S NAME:</th>
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<th>NICKNAME:</th>
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<th>CCN:</th>
<th>20-022611</th>
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<th>598660</th>
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**DEFENDANT’S HOME ADDRESS:**
(LKA) 281 Newcomb Street SE, Apartment #2

**TELEPHONE NUMBER:**
(202) 560-8014

**DEFENDANT’S BUSINESS ADDRESS:**

**TELEPHONE NUMBER:**

**COMPLAINT NAME:**
M.A.

**DATE OF OFFENSE:**
February 6, 2020

**LOCATION OF OFFENSE:**
1600 New York Ave NE, Room# 214

**TIME OF OFFENSE:**
14:42 Hours

**DATE OF OFFENSE:**
February 6, 2020

**TIME OF OFFENSE:**
14:42 Hours

| CAUTION AND MEDICAL CONDITIONS (CMC) |
| Select a valid CMC code below for wanted person when using the caution indicator. |
| 00 = Armed and Dangerous | 05 = Violent Tendencies | 10 = Martial Arts Expert | 15 = Explosive Expertise |
| 20 = Check | 25 = Escaped Risk | 30 = Sexually Violent Predator | 35 = Policing |
| 40 = Battered Wife | 45 = Elderly | 50 = Heart Condition | 55 = Alcoholic |
| 60 = Alcoholic | 65 = Epilepsy | 70 = Suicidal | 75 = Diabetic |
| 80 = Medication Required | 85 = Hemophilia | 90 = Heart Problem | 95 = Sickle Cell Anemia |
| 96 = summary | 97 = Other | 98 = Known to abuse drugs |

**GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:**

Inn Hotel on January 15, 2020, after a domestic incident with the DEFENDANT. The decedent’s father reported that he saw the decedent and his 20-month-old child on Monday, February 3, 2020 after he picked up the DEFENDANT and the children from the hotel to go to Greenbelt, Maryland to cash a check.

The decedent’s father reported that the next time he saw the DEFENDANT, the decedent and their 20-month-old child was on Wednesday, February 5, 2020 when he took them to the movies at about 4:00pm or 5:00pm in Marlow Heights, Maryland. The decedent’s father stated that the decedent appeared fine and ate some popcorn while at the movies. The decedent’s father reported that they left the movie early but he couldn’t explain why.

The decedent’s father reported that he drove the DEFENDANT to the hospital and then took his 20-month-old child to a family’s member’s home. About thirty (30) minutes later, the DEFENDANT called him and told him that the decedent died from a “skull injury.”

The decedent’s father stated that he didn’t know what happened to the decedent. He stated that he had not seen the DEFENDANT physically discipline their children but the DEFENDANT had put the children in a “time-out” or made them stand in a corner. The father thinks the DEFENDANT is a good mother.

On Thursday, February 6, 2020, a member of the Homicide Branch was able to speak with the DEFENDANT’s social worker, hereinafter referred to as Witness Two (W2). W2 reported that the majority of ITs

**AFFIANT’S SIGNATURE:**

x Chanel N. Howard

**TO: WARRANT CLERK**

**PLEASE ISSUE A WARRANT FOR:**

**TYRA MONAE ANDERSON**

Charge With: First Degree Felony Murder (Cruelty to Children)

**ASSISTANT UNITED STATES ATTORNEY**

--- NCIC APPROVED ---

**SUBSCRIBED AND SWORN BEFORE ME THIS**

HAY OF JU 20 20

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

**Revision Date: 11-20-06**

Page 8 of 25
Exhibit B p. 009

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: ANDERSON, Tyra Monae
NICKNAME: 
ALIASES: 
CCN: 20-022611
PDID / FBE: 598660
SEX: F
RACE: BLK
DOB: 1/29/1993
HGT: 5’4
WGT: 130
EYES: BRN
HAIR: BLK
COMPL: DARK
SCARS, MARKS, TATTOOS
TELEPHONE NUMBER: (202) 560-8014
DEFENDANT’S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2
DEFENDANT’S BUSINESS ADDRESS: 
COMPLAINANT’S NAME: M.A.
TELEPHONE NUMBER: None
LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214
DATE OF OFFENSE: February 6, 2020
TIME OF OFFENSE: 14:42 Hours
CAUTION AND MEDICAL CONDITIONS (CMC)
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80 = Medication Required
85 = Hemophilia
90 = Diabetic
60 = Allergies
20 = Known to abuse drugs
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Communication with the DEFENDANT was over the telephone and it last saw the DEFENDANT on January 21, 2020. The DEFENDANT was crying and appeared distressed. W2 advised that the DEFENDANT suffers from depression and an adjustment disorder. W2 further reported that it sent text messages to the DEFENDANT on Thursday, February 6, 2020, at 10:33, 10:34, 10:36, and 10:37 hours. The DEFENDANT called W2 back and they discussed housing needs. W2 reported that at no time during the call or text messages did the DEFENDANT report that the decedent was hurt or needed medical attention.

On Friday, February 7, 2020, your affiant responded to the DC OCMF to observe the decedent’s post-mortem examination. The examination was performed by Dr. Jonie Taylor. Prior to the examination, the staff washed the decedent’s remains and observed a brown-colored residue on the towels and sponges. A member of the staff noted that the residue looked like make-up or some type of cosmetic. Once the decedent was fully washed, Dr. Taylor noted multiple contusions to the decedent’s head and face were now visible and apparent. Your affiant recalled observing cosmetic items in one of the dresser drawers in room #214 during the search warrant. The items were not seized, as their relevance to the decedent’s death was not known or assumed at that time.

At about the same time, a Homicide Branch official learned from the shelter staff that the DEFENDANT had refused to allow housekeeping staff to enter or clean room #214 on Wednesday, February 5, 2020. It was then determined that no one be allowed to enter room #214 until a second search warrant could be obtained to search for and seize additional potential evidence.

AFFIANT’S SIGNATURE:

X Chanel N. Howard

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)
ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

SUBSCRIBED AND SWEORN BEFORE ME THIS 12/01/20
JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Dater 11-20-06 Page 9 of 25
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: ANDERSON, Tyra Monae

NICKNAME: ALIASES: CCN: PDID / FBE:


TELEPHONE NUMBER: (202) 560-8014

DEFENDANT’S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2

DEFENDANT’S BUSINESS ADDRESS:

COMPLAINANT’S NAME: M.A. TELEPHONE NUMBER: None

LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214 DATE OF OFFENSE: February 6, 2020 TIME OF OFFENSE: 14:42 Hours

DATE OF OFFENSE: CAUTION AND MEDICAL CONDITIONS (CMC)

TIME OF OFFENSE:

Select a valid CMC code below for wanted person when using the caution indicator.

_00 = Armed and Dangerous _25 = Escape Risk _65 = Epilepsy _01 = Other (Explain)

_05 = Violent Tendencies _30 = Sexually Violent Predator _70 = Suicidal _90 = Diabetic

_10 = Martial Arts Expert _50 = Heart Condition _80 = Medication Required _60 = Allergies

_15 = Explosive Expertise _55 = Alcoholic _85 = Hemophilia _20 = Known to use drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

In light of this new information, a member of the Homicide Branch applied for a second D.C. Superior Court Search Warrant for 1600 New York Ave, NE, room #214 to search for and seize any and all cosmetic items from the location. That warrant was approved and signed by the Honorable Judge Danya Dayson. Members of DFS responded back to the hotel and recovered assorted make-up items and an empty make-up box with the brand name “ELF” from the top drawer of the night stand.

During the execution of the warrant, the DEFENDANT returned to the hotel and asked a Homicide Branch official why a second warrant was being executed. The official told the DEFENDANT that members of DFS were seizing her makeup and cosmetics in regards to the decedent’s death. The DEFENDANT then stated “I don’t wear make-up, it’s makeup in the room because the kids play with the makeup.”

Dr. Taylor completed the autopsy and noted that the decedent suffered from multiple acute contusions to the face and head, acute skull fractures, a laceration to the upper frenulum, a laceration inside the left ear, pulmonary edema, and hemorrhaging in the bilateral optic nerve sleeve. The decedent had very little stomach content and had firm, dark stool in her bowels. Dr. Taylor ruled the cause of death as Blunt Force to the Head (Trauma Inflicted by Another) and the manner of death as Homicide.

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

Signature: 12/01/20

-- NCIC APPROVED --
Detectives have interviewed several witnesses in regards to this event. A third witness, hereinafter referred to as Witness Three (W3), reported that IT observed the decedent inside room #214 on Tuesday, February 4, 2020, sometime before 2130 hours. W3 estimated the time because residents in the hotel are not supposed to be in each other’s rooms and IT would not have been in the room, at or near the curfew check. W3 reported IT observed the decedent sitting in a baby walker. The decedent had a bump on her head and a scab on one of her hands. The DEFENDANT told W3 that the decedent fell at a family member’s home. W3 further reported that the decedent was leaning to one side and the DEFENDANT kept pushing the decedent’s head back up saying “[M], lift your head up.”

W3 reported that the decedent was whimpering and shaking. W3 also stated that IT always saw the DEFENDANT giving the children hugs and kisses, but IT had a “bad vibe” about the decedent’s injuries.

A fourth witness, hereinafter referred to as Witness Four (W4), reported seeing the DEFENDANT at the hotel on Thursday, February 6, 2020, at about 1300 hours. When asked what the DEFENDANT’s demeanor was, W4 stated that the DEFENDANT seemed fine.

A fifth witness, hereinafter referred to as Witness Five (W5) reported seeing the DEFENDANT at the hotel picking up her dinner on Wednesday, February 5, 2020. W5 knew that the DEFENDANT had two minor
Exhibit B p. 012

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
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<tr>
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<td>(LKA) 281 Newcomb Street SE, Apartment #2</td>
</tr>
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

children that lived with her. W5 asked the DEFENDANT where were her other children and the DEFENDANT stated “at grandma’s.”

A sixth witness, hereinafter referred to as Witness Six (W6), is an employee at the Quality Inn hotel. W6 had previously reported that the DEFENDANT did not leave her room on Wednesday, February 5, 2020, and had refused housekeeping services.

A seventh witness, hereinafter referred to as Witness Seven (W7), is a close family member of the decedent’s father. W7 reported that one of the DEFENDANT’s minor children lived with it during the week so the minor child can go to school. W7 advised that the minor child, hereinafter referred to as Witness Eight (W8), was with DEFENDANT, ITs sibling, and the decedent at the hotel from February 2, 2020, until the morning of February 3, 2020.

On February 7, 2020, your affiant responded to the Safe Shores D.C. Children’s Advocacy Center to observe the forensic interview of W8. The interview was conducted in a room equipped with cameras and microphones. A forensic interviewer (FI) escorted W8 to the room and initiated the interview. The FI asked W8 a series of questions to ascertain if IT was aware of what may have happened to the decedent. During the interview, W8 would refer to the decedent using an abbreviated version of the decedent’s given name.

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

AFFIANT’S SIGNATURE: 

x Chanel N. Howard

SUBSCRIBED AND SWEARING BEFORE ME THIS ___________ 2020

JUDGE (JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

-- NCIC APPROVED --

Form CD(17)-1020

Revision Date 11-29-06
Page 12 of 25
Superior Court of the District of Columbia  
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

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- 20 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

During the interview, the FI asked W8 if IT knew what happened to the decedent. W8 stated that the decedent was sick and had to go to the doctor. W8 stated that the decedent “spit up” in the bed and a family member picked IT up for school. The FI asked W8 who was in the bed with the decedent when she got sick and W8 replied that IT was in the bed. W8 also stated that the decedent slept with the DEFENDANT.

The FI asked W8 about who IT lived with and W8 stated that IT had stayed at the hotel with the DEFENDANT but IT wasn’t going there anymore. W8 stated that the decedent’s father was not at the hotel with IT and that IT did not know why.

The FI asked W8 if the DEFENDANT ever hurt IT (W8) and W8 responded no, adding that the DEFENDANT had hit IT and put IT in a time out. According to W8, the DEFENDANT had also hit IT’s friends but IT did not remember the names of the friends. It should be noted that your affiant was not able to confirm or refute the allegation that the DEFENDANT had struck any of W8’s friends.

During the investigation, there were multiple calls made to the Homicide Branch and the Command Information Center (CIC) regarding the investigation.

On Monday, February 10, 2020, your affiant was contacted by a member of MPD’s Youth and Family Services Division (YFSD), who reported that IT received an email from a subject who called the CIC and left IT’s name

AFFIANT’S SIGNATURE:  
X Chanel N. Howard

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --
Superior Court of the District of Columbia  
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT  
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1600 New York Ave NE, Room# 214  
**DATE OF OFFENSE:** February 6, 2020  
**TIME OF OFFENSE:** 14:42 Hours

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- 91 = Other (Explain)
- 92 = Allergies
- 93 = Known to abuse drugs

**GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:**

and number for contact. The caller stated that “[IT was related] to the decedent. The caller stated that on the day of the baby’s death, IT’s family member called Tyra Anderson (DEFENDANT) to ask what happened. According to [the caller], Tyra stated, “I don’t know (sic), I was on the phone,” and that later, Tyra said “I don’t know, the baby fell.” Then Tyra recalled her story a third time, stating “Ask [the father].”

The caller also reported that the DEFENDANT told someone else that she “picked the baby up that way from her grandmothers.” The YFSD member stated that the caller wanted the information to get passed along because of how she (DEFENDANT) kept changing her story.

On Tuesday, February 11, 2020, the CIC received multiple calls in reference to the investigation. One caller, who asked to remain anonymous, stated IT was related to the family through a marriage and that “the detectives should look at the father because he hits his mother, grandmother and aunt and he is a drug abuser.” The caller also stated that a member of the father’s family is law enforcement and that the member is called whenever there is a dispute so there’s no record of an altercation. The caller stated that IT wanted to remain anonymous and “only wants justice for the baby.”

In a second call, the caller, who is also related to the decedent, reported that IT “felt that the mother killed the baby because she took the baby to the hospital in her unresponsive state and then dropped the infant off anonymous.” Also, “[IT] has all of her [DEFENDANT] text messages from her [DEFENDANT], through ITs

**AFFIANT'S SIGNATURE:**  

x Chanel M. Howard

---

**TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

**TYRA MONAE ANDERSON**

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

--- NCIC APPROVED ---

**SUBSCRIBED AND SWORN BEFORE ME THIS**  
**DAY OF 12/01/20**

(JUDGE) DEPUTY CLERK  
SUPERIOR COURT OF THE  
DISTRICT OF COLUMBIA

Revision Date: 11-20-06  
Page 14 of 25
## SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

**CRIMINAL DIVISION**

**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**

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**DEFENDANT'S HOME ADDRESS:**
(LKA) 281 Newcomb Street SE, Apartment #2

**DEFENDANT'S BUSINESS ADDRESS:**

| COMPLAINANT'S NAME: | M.A |
|                     |     |
| TELEPHONE NUMBER:   | None |

**LOCATION OF OFFENSE:**
1600 New York Ave NE, Room# 214

| DATE OF OFFENSE:   | February 6, 2020 |
| TIME OF OFFENSE:   | 14:42 Hours |

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**GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:**

[family members'] phone and she [DEFENDANT] it texting IT and [family member] to stop bothering her.” This caller, who provided IT's name and number, added that “if they call again, [IT] will then block them.” Your affiant contacted this caller for additional information, who stated that IT had also called MPD on February 10, 2020, to provide information, as IT wanted to make sure that detectives were aware of how the father and the DEFENDANT were acting and that they both should be investigated.

Your affiant was also able to meet with and obtain a statement from the family member who works in law enforcement. The family member said that although IT is related to the decedent’s father, IT has not been to the father’s home in several weeks and had never responded to an altercation involving the father or any of IT's family members.

In a third call, an anonymous caller reported that IT was related to the decedent's father's family. The caller stated that the decedent’s paternal grandmother, whom IT identified by name, and the decedent’s father, should be questioned because “they are beating the kids.” The caller provided personal information about the decedent’s paternal grandmother and the minor children of the DEFENDANT and the decedent’s father. The caller stated that the DEFENDANT and “Mr. Brown” are both responsible for the decedent’s death. The caller stated that the decedent’s father and the DEFENDANT were both high on Percocet and an unknown drug when they killed the decedent. The caller also stated that “Mr. Brown” used to have an Instagram social media account with the username “mobrown” but isn’t sure if he deleted it.

**AFFIANT’S SIGNATURE:**

[Signature]

**TO: WARRANT CLERK**

**PLEASE ISSUE A WARRANT FOR:**

**TYRA MONAE ANDERSON**

Charge With: First Degree Felony Murder (Cruelty to Children)

**ASSISTANT UNITED STATES ATTORNEY**

**SUBSCRIBED AND SWORN BEFORE ME THIS**

[Signature]

**DAY OF**

| 12/01/20 |

**(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**

**NCIC APPROVED**
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: ANDERSON, Tyra Monae

NICKNAME: 

ALIASES: 

CCN: 20-022611

PDID / FBE: 598660

SEX: F

RACE: BLK

DOB: 1/29/1993

HGT: 5'4

WGT: 130

EYES: BRN

HAIR: BLK

COMPL: DARK

SCARS, MARKS, TATTOOS

DEFENDANT’S HOME ADDRESS: 

(LKA) 281 Newcomb Street SE, Apartment #2

TELEPHONE NUMBER: (202) 560-8014

DEFENDANT’S BUSINESS ADDRESS: 

TELEPHONE NUMBER: 

COMPLAINANT’S NAME: M.A.

TELEPHONE NUMBER: None

LOCATION OF OFFENSE: 

1600 New York Ave NE, Room# 214

DATE OF OFFENSE: February 6, 2020

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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Your affiant reports that the decedent’s father has a close family member with the last name of “Brown.” This information was also captured in the tip as the caller reported that the decedent’s father’s grandmother “is watching ITs [family member with last of Brown] who lives on [a particular Street] on the weekends and IT is getting paid.” It should also be noted that your affiant has spoken to the decedent’s maternal and paternal grandmother in regards to the investigation. Based on this information, the caller appears to be comingle the maternal and paternal grandmother’s familial roles.

On that same day, your affiant answered a call that had been transferred from the CIC. The caller, who wished to remain anonymous, stated that the decedent’s father had been crying and talking about the investigation. The caller believed that the father knew what happened to the decedent and that he had been texting the DEFENDANT about talking to the police. The caller also reported that the father was told to delete the messages by another family member. The caller reported that the father stated “I should have said something, I should have done something.” This caller also reported that the father was getting calls and text messages from the DEFENDANT in the days after the decedent died and may have left home to meet the DEFENDANT. The caller stated that the father and the DEFENDANT take ecstasy and smoke PCP together. The caller also made statements about the father being related to a man of law enforcement.

Your affiant was able to review surveillance footage from the Quality Inn hotel located at 1600 New York Ave, NE, from Saturday, February 1, 2020 through Thursday, February 6, 2020.

AFFIANT’S SIGNATURE: x Chanel N. Howard

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

SUBSCRIBED AND SWORN BEFORE ME THIS __________ 20__

(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:  

On Saturday, February 1, 2020, there are images of a white four-door vehicle, which had been identified as the decedent’s father’s vehicle, parked on New York Avenue, NE. The DEFENDANT, the decedent and the 20-month-old child are seen exiting the vehicle and entering the hotel at about 20:34, according to the video timestamp. The decedent appeared awake and alert. The DEFENDANT, with the decedent and 20-month-old child, stop at the front counter for about four minutes and then go upstairs to room #214. At the 20:43 timestamp, the DEFENDANT and the 20-month-old child leave room #214 and walk to a trash can. The DEFENDANT does not have the decedent with her.  

On Sunday, February 2, 2020, the decedent’s father is seen arriving at the hotel at the 14:40 timestamp. He parked his vehicle on New York Avenue, NE. The DEFENDANT walked out to the father’s vehicle and returned to the hotel with what appears to be a bag of food. The DEFENDANT does not have the decedent or the 20-month-old child with her.  

On this same day, at the 20:10 timestamp, the decedent’s father’s vehicle is stopped on New York Avenue, NE. The DEFENDANT and the 20-month-old child walk outside to the vehicle. The DEFENDANT does not have the decedent with her. A short time later, the DEFENDANT re-enters the hotel with the 20-month-old child and W8. A few minutes later, at the 20:25 timestamp, the DEFENDANT, the 20-month-old child and W8 exit room #214 and go downstairs. They do not have the decedent with them. They return to room #214 a short time later.  

TO: WARRANT CLERK  
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TYRA MONAE ANDERSON  

Charge With:  
First Degree Felony Murder (Cruelty to Children)  

ASSISTANT UNITED STATES ATTORNEY  

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x Chanel N. Howard  

SUBSCRIBED AND SWORN BEFORE ME THIS  

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<th>DEFENDANT’S BUSINESS ADDRESS:</th>
<th>TELEPHONE NUMBER:</th>
<th></th>
</tr>
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<tbody>
<tr>
<td></td>
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<table>
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<tr>
<th>COMPLAINANT’S NAME:</th>
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<tbody>
<tr>
<td>M.A.</td>
<td>None</td>
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<tr>
<th>LOCATION OF OFFENSE:</th>
<th>DATE OF OFFENSE:</th>
<th>TIME OF OFFENSE:</th>
</tr>
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<tbody>
<tr>
<td>1600 New York Ave NE, Room #214</td>
<td>February 6, 2020</td>
<td>14:42 Hours</td>
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<tr>
<th>CAUTION AND MEDICAL CONDITIONS (CMC)</th>
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<tbody>
<tr>
<td>Select a valid CMC code below for wanted person when using the caution indicator.</td>
</tr>
<tr>
<td>00 = Armed and Dangerous</td>
</tr>
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<td>05 = Violent Tendencies</td>
</tr>
<tr>
<td>10 = Martial Arts Expert</td>
</tr>
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<td>15 = Explosive Expertise</td>
</tr>
</tbody>
</table>

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Later, at the 21:51 timestamp, the DEFENDANT, the 20-month-old child and W8 are seen leaving room #214 again. They did not have the decedent with them. The DEFENDANT, the 20-month-old child and W8 all had on coats. The DEFENDANT had a purse strap across her body. About nine minutes later, the DEFENDANT, the 20-month-old child and W8 exited the hotel to meet the decedent’s father. The fathers’ vehicle was stopped on New York Avenue, NE. Twelve minutes later, at the 22:03 timestamp, the DEFENDANT, the 20-month-old child and W8 returned to room #214.

On Monday, February 3, 2020 at the 08:31 timestamp, the DEFENDANT walked W8 out to the decedent’s fathers’ vehicle that was stopped on New York Avenue, NE. The DEFENDANT did not have the decedent or the 20-month-old child with her. Later this day, at the 12:34 timestamp, the DEFENDANT carried the decedent out of the hotel. The 20-month-old child followed. The decedent appeared limp with her head positioned at the DEFENDANT’s shoulder. The DEFENDANT and the 20-month-old child walked outside to the decedent’s father’s vehicle that was stopped on New York Avenue, NE.

At the 19:19 timestamp, the fathers’ vehicle returned to the hotel. The DEFENDANT exited the vehicle, carrying the 20-month-old child. The DEFENDANT went upstairs to room #214 and returned to the vehicle about 15 minutes later with a pink backpack. The DEFENDANT did not have the decedent with her.

AFFIANT’S SIGNATURE:

x
Chanel N. Howard

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

NSC Approved

SUBSCRIBED AND SWORN BEFORE ME THIS 12/01/20

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-20-06 Page 18 of 25
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: ANDERSON, Tyra Monae

DEFENDANT'S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2

DEFENDANT'S BUSINESS ADDRESS: TELEPHONE NUMBER:


DEFENDANT'S BUSINESS ADDRESS: TELEPHONE NUMBER:

LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214 DATE OF OFFENSE: February 6, 2020 TIME OF OFFENSE: 14:42 Hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

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- 05 = Violent Tendencies
- 10 = Martial Arts Expert
- 15 = Explosive Expertise
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- 50 = Heart Condition
- 55 = Alcoholic
- 65 = Epilepsy
- 70 = Suicidal
- 80 = Medication Required
- 85 = Hemophilia
- 90 = Diabetic
- 91 = Other (Explain)
- 60 = Allergies
- 20 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

On Tuesday, February 4, 2020, at the 20:00 timestamp, the father’s vehicle arrived at the hotel. The DEFENDANT, carrying the decedent, entered the hotel. The DEFENDANT had the pink backpack. The 20-month-old child followed. The decedent still appeared limp with her head positioned at the DEFENDANT’s shoulder. They returned to room #214.

On Wednesday, February 5, 2020, at the 19:48 timestamp, the DEFENDANT and the 20-month-old child are seen exiting room #214. The DEFENDANT does not have the decedent with her. The DEFENDANT took the 20-month-old child downstairs to the cafeteria. The DEFENDANT left the cafeteria with a bag of food. The DEFENDANT stopped by the front counter and picked up an item from the counter. About five minutes later, the DEFENDANT and the 20-month-old child returned to room #214.

Later this day, at the 23:05 timestamp, the DEFENDANT carried the 20-month-old child outside to the decedent’s father’s vehicle, which was stopped on New York Avenue, NE. The DEFENDANT did not have the decedent with her.

On Thursday, February 6, 2020, at the 14:11 timestamp, the DEFENDANT is seen carrying the decedent from room #214 and out of the hotel. The 20-month-old child followed the DEFENDANT. The decedent was completely covered in a pink blanket or coat. They exited the hotel and walked to the father’s vehicle that was stopped on New York Avenue, NE.

AFFIANT’S SIGNATURE: x

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS ___ DAY OF 12/01/20
JUDGE DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

-- NCIC APPROVED --
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: ANDERSON, Tyra Monae
NICKNAME: 
ALIASES: 
CCN: 20-022611
PDID / FBE: 598660


DEFENDANT’S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2
TELEPHONE NUMBER: (202) 560-8014

DEFENDANT’S BUSINESS ADDRESS: 
TELEPHONE NUMBER: 

COMPLAINANT’S NAME: M.A. 
TELEPHONE NUMBER: None

LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214
DATE OF OFFENSE: February 6, 2020
TIME OF OFFENSE: 14:42 Hours

CAUTION AND MEDICAL CONDITIONS (CMC)
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Your affiant was also able to review footage from a hotel camera, identified as Camera 3 (215), mounted in the hallway outside of room #214. The camera did not capture images of the doors of #214 or #215. The timestamp on the footage appears to be five to six minutes faster than the footage described above in the affidavit. This particular camera captured images of the DEFENDANT, either with or without the decedent, the 20-month-old child or W8, on the same days during the same timeframe as the other footage.

On Wednesday, February 12, 2020, your affiant, Detective Anthony Greene, and a social worker from the Child and Family Services Agency (CFSA), spoke with family members of the decedent’s father. The social worker wanted to meet with the family to attempt a mediation over a conflict. Your affiant and Detective Greene met with and spoke to the decedent’s father about whether or not he was able to gain information about what happened to the decedent. The father replied “I don’t know.” Your affiant asked the decedent’s father if the DEFENDANT had told him anything; the father stated “I don’t know what happened to my daughter.” Your affiant told the decedent’s father that wasn’t the question. Your affiant asked the father, again, had the DEFENDANT told him what happened to the decedent. The father repeated multiple times “I don’t know, I don’t know, I don’t know what happened to her.”

Your affiant and Detective Greene confronted the decedent’s father with the inconsistencies in the timeline that he reported on February 6, 2020. Detectives asked the decedent’s father why he didn’t disclose that he picked

AFFLIANT’S SIGNATURE: 

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

SUBSCRIBED AND SWORN BEFORE ME THIS

JUDGE (DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-20-06 Page 20 of 25
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: ANDERSON, Tyra Monae


DEFENDANT'S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2

DEFENDANT'S BUSINESS ADDRESS:

TELEPHONE NUMBER:
(202) 560-8014

TELEPHONE NUMBER:

COMPLAINANT'S NAME: M.A.

TELEPHONE NUMBER: None

LOCATION OF OFFENSE:
1000 New York Ave NE, Room# 214
DATE OF OFFENSE: February 6, 2020
TIME OF OFFENSE: 14:42 Hours

CAUTION AND MEDICAL CONDITIONS (CMC)
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_91 = Other (Explain)
_60 = Allergies
_20 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

up the DEFENDANT, the decedent, and the 20-month-old child from the hotel on Monday, February 3, 2020 and did not return until Tuesday, February 4, 2020. The decedent’s father now denied being there. Your affiant advised the decedent’s father that the hotel had cameras and he was observed at the hotel on Monday, February 3, 2020 at about 19:30 hours. The decedent’s father stated that he might have taken them to get something to eat but he wasn’t sure. Detective Greene asked the father to check his phone for the calls or text messages from the DEFENDANT because maybe that would help him remember. The decedent’s father threw his hands in the air and stated “I don’t know what ya’ll want. I told ya’ll I don’t know. I don’t know what happened.”

During the course of the investigation, your affiant executed D.C. Superior Court warrants to obtain the cellular tower data for the cell phones of the DEFENDANT and the decedent’s father. Contrary to their representations, the cell towers relevant to the Marlow Heights Movie Theater did not show them at that location on Wednesday, February 6, 2020. Furthermore, after reviewing the footage from the Marlow Heights Movie Theater security cameras, there is no footage of the DEFENDANT, the decedent’s father, or their minor children entering or leaving the movie theater between February 1 and February 6, 2020.

On Thursday, February 13, 2020, your affiant was able to review the surveillance footage from the CNMC. The footage captured images from the front entrance, the main lobby, the main Ortho hallways and the Emergency Department cameras. On Thursday, February 6, 2020, at 2:35:11 pm, the DEFENDANT is seen calmly walking into the hospital. The decedent is completely wrapped in a pink blanket. At 2:35:29, the DEFENDANT walked

AFFIANT'S SIGNATURE: Chanel N. Howard

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS __________ 20

DAY OF

JUDGE (JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

-- NCIC APPROVED --

Form CD(1)-1020
Revision Date: 11-29-06
Page 21 of 25
AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: ANDERSON, Tyra Monae
NICKNAME: 
ALIASES: 
CCN: 20-022611
PDID / FBE: 598660
SEX: F
RACE: BLK
DOB: 1/29/1993
HGT: 5’4
WGT: 130
EYES: BRN
HAIR: BLK
COMPL: DARK
SCARS, MARKS, TATTOOS
DEFENDANT’S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2
TELEPHONE NUMBER: (202) 560-8014
DEFENDANT’S BUSINESS ADDRESS: 
TELEPHONE NUMBER: 
COMPLAINANT’S NAME: M.A.
TELEPHONE NUMBER: None
LOCATION OF OFFENSE: 1600 New York Ave NE, Room # 214
DATE OF OFFENSE: February 6, 2020
TIME OF OFFENSE: 14:42 Hours
CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

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<th>Code</th>
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<tr>
<td>60</td>
<td>Allergies</td>
</tr>
<tr>
<td>20</td>
<td>Known to abuse drugs</td>
</tr>
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

past a hospital employee, hereinafter referred to as Witness Nine (W9). W9 reported that IT asked the DEFENDANT if she was OK and the DEFENDANT stated “my baby isn’t breathing.” It is at this point that the DEFENDANT began to show distress.

At 2:36:38 pm, hospital staff became aware of the severity of the decedent’s condition and walked the DEFENDANT towards the emergency room. The DEFENDANT can be seen on the footage unwrapping the blanket from around the decedent. The DEFENDANT now appeared to be crying.

At 2:37:09 pm, a member of the hospital staff ran toward the DEFENDANT and took the decedent from her. The hospital then called a Code Blue. The DEFENDANT struggled with the staff member, appearing as if she won’t let the member take the decedent from her. A few seconds later, security officers, staff members and the DEFENDANT are seen running toward the emergency room. At 2:37:50, the staff member ran into the emergency room, closely followed by a large group of medical staff who began to initiate life-saving measures. The DEFENDANT still had the pink blanket that was wrapped around the decedent. After several minutes of life-saving efforts, Dr. Cohen pronounced the decedent dead at 2:42 p.m. At 3:02:59 pm, a member of MPD arrived at the hospital.

Your affiant was able to meet with and speak with another family member of the DEFENDANT, hereinafter referred to as Witness Ten (W10). W10 reported that IT had not seen the DEFENDANT and the decedent since

AFFIANT’S SIGNATURE: x Chanel N. Howard

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

SUBSCRIBED AND SWORN BEFORE ME THIS ___________________________ 2020
JUDGE (DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Page 22 of 25

Revision Date: 11-20-06
Form CD(17) 1020
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

| DEFENDANT’S NAME: | ANDERSON, Tyra Monae |
| NICKNAME: | |
| ALIASES: | |
| CCN: | 20-022611 |
| PDID / FBE: | 598660 |
| SEX: | F |
| RACE: | BLK |
| DOB: | 1/29/1993 |
| HGT: | 5’4 |
| WGT: | 130 |
| EYES: | BRN |
| HAIR: | BLK |
| COMPL: | DARK |
| SCARS, MARKS, TATTOOS: | |

DEFENDANT’S HOME ADDRESS:
(LKA) 281 Newcomb Street SE, Apartment #2
TELEPHONE NUMBER: (202) 560-8014

DEFENDANT’S BUSINESS ADDRESS: |
TELEPHONE NUMBER: |

COMPLAINANT’S NAME: M.A. |
TELEPHONE NUMBER: None |

LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214 |
DATE OF OFFENSE: February 6, 2020 |
TIME OF OFFENSE: 14:42 Hours |

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- 65 = Epilepsy
- 70 = Suicidal
- 80 = Medication Required
- 85 = Hemophilia
- 90 = Diabetic
- 91 = Other (Explain)
- 60 = Allergies
- 20 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

the weekend of January 11, 2020. W10 reported that the decedent was prone to falling, IT assumed it was because of seizures, but was not sure of the actual cause. W10 reported that, on one occasion, the decedent fell from a sofa in ITs home, but did not incur an injury. W10 reported that IT did not see the fall, but the DEFENDANT was with the decedent and her siblings at the time.

Shortly after the communication with W10, your affiant received a text from the DEFENDANT. In the text, the DEFENDANT stated “I don’t want to talk to you without a lawyer.”

In the days after the death, your affiant was able to meet with W10 at the Homicide Branch. W10 reiterated the same information from our previous conversation and added that the decedent’s father is violent, used drugs and neglected his children. W10 also stated that IT believed the decedent’s father hurt the decedent and that the DEFENDANT is trying to protect him. During our conversation, W10 received and sent text messages to a contact that appeared to be the DEFENDANT. W10 provided your affiant with a picture of the decedent and her siblings, taken on January 12, 2020. In the image, the decedent appeared alert and happy.

During the investigation, your affiant learned that the DEFENDANT and the decedent’s father took the decedent to CNMC after they were in a minor motor vehicle accident on December 6, 2019. In the report, a vehicle travelling at approximately twenty miles an hour struck their car. The air bags did not deploy and the decedent

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

AFFIANT’S SIGNATURE: x Chanel N. Howard

SUBSCRIBED AND SWORN BEFORE ME THIS 12/01/20

JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-20-06
Page 29 of 25
AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: ANDERSON, Tyra Monae
NICKNAME: 
ALIASES: 
CCN: 20-022611
PDID / FBE: 598660
SEX: F 
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DOB: 1/29/1993 
HGT: 5'4 
WGT: 130 
EYES: BRN 
HAIR: BLK 
COMPL.: DARK 
SCARS, MARKS, TATTOOS: TELEPHONE NUMBER: (202) 560-8014
DEFENDANT'S HOME ADDRESS: (LKA) 281 Newcomb Street SE, Apartment #2
DEFENDANT'S BUSINESS ADDRESS: TELEPHONE NUMBER: 
COMPLAINANT'S NAME: M.A. 
TELEPHONE NUMBER: None 
LOCATION OF OFFENSE: 1600 New York Ave NE, Room# 214 
DATE OF OFFENSE: February 6, 2020 
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- 80 = Medication Required 
- 85 = Hemophilia 
- 90 = Diabetic 
- 91 = Security Risk (Call 911) 
- 99 = Other (Explain) 
- 60 = Allergies 
- 20 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

was restrained in a car seat in the back seat. At the time of the report, the decedent showed no signs of seatbelt injuries, no signs of head trauma, nor any other injuries.

Your affiant reports that the DEFENDANT provided multiple statements to hospital staff and law enforcement reporting that she left her 20-month-old child and the decedent together in room #214 on Wednesday, February 5, 2020, while she went downstairs to get dinner. Conversely, on this same day, the DEFENDANT told W5 that her other children "were at grandma's."

Your affiant further reports that there is no indication that DEFENDANT ever sought medical assistance for the decedent, nor are there any images in the video surveillance of the DEFENDANT approaching hotel staff members, residents, or security to call 911 or attempt to get medical assistance for the decedent. Your affiant submits that at no time in the video surveillance footage does the DEFENDANT appear to be distressed, anxious, or in a heightened state while at the hotel between Saturday, February 1, 2020 and Thursday, February 6, 2020.

Pursuant to the investigation into this matter, as outlined above, your affiant believes that the DEFENDANT intentionally inflicted the decedent's injuries and/or failed to seek immediate medical treatment which created a grave risk of bodily harm to M.A. and which ultimately led to the decedent's death. Based on the facts set forth in this affidavit, your affiant respectfully submits that probable cause exists that the DEFENDANT, Tyra Anderson, caused the decedent's death. In addition, specifically, the DEFENDANT's conduct constituted First

AFFIANT'S SIGNATURE: [Signature]

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
TYRA MONAE ANDERSON
Charge With: First Degree Felony Murder (Cruelty to Children)
ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

SUBSCRIBED AND SWORN BEFORE ME THIS [Signature] 12/01/20
JUDICIAL DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-20-06
Page 24 of 25
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

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<td>Degree Cruelty to Children, a predicate offense to First Degree Felony Murder. Therefore, your affiant respectfully requests that an arrest warrant be issued charging the DEFENDANT, Tyra Anderson, with First Degree Felony Murder.</td>
</tr>
</tbody>
</table>

AFFIANT’S SIGNATURE:  
CHANEL M. HOWARD

TO: Warrant Clerk

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSON

Charge With: First Degree Felony Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

SUBSCRIBED AND SWORN BEFORE ME THIS 12/01/20

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

12/2/20

Page 25 of 25
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<tr>
<th>Date</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>November 2019</td>
<td>Defendant’s apartment located at 281 Newcomb Street Southeast, Apt. 2 D.C. caught fire and she moved to Quality Inn, 1600 New York Avenue, Washington, D.C.</td>
</tr>
<tr>
<td>December 6, 2019</td>
<td>Defendant and decedent’s father were in a car collision and hit head on by another vehicle, traveling at 20 mph and no air bags were deployed. Decedent, who had been restrained in a car seat, was taken to CNMC by defendant and her father. Doctors found that there were no signs for trauma and decedent appeared well.</td>
</tr>
<tr>
<td>January 15, 2020</td>
<td>Decedent’s father was barred from the Quality Inn because of an incident with the defendant.</td>
</tr>
<tr>
<td>FEBRUARY 1, 2020 SATURDAY 20:34 p.m.</td>
<td>Decedent’s fathers’ vehicle (white sedan) stopped in front of Quality Inn at 1600 New York Avenue, NE. Defendant seen leaving the father’s car carrying decedent (blue coat/pink hat) and 20-month-old child.</td>
</tr>
<tr>
<td>20:35</td>
<td>Defendant at front counter of Quality Inn with decedent and 20-month-old child. This is the last time the decedent is seen in a viable state.</td>
</tr>
<tr>
<td>Time</td>
<td>Activity</td>
</tr>
<tr>
<td>------------</td>
<td>--------------------------------------------------------------------------</td>
</tr>
<tr>
<td>FEBRUARY 2, 2020 SUNDAY 14:40</td>
<td>Defendant walks out to decedent’s father car and does not have either of her children.</td>
</tr>
<tr>
<td></td>
<td>Defendant returning to room# 214.</td>
</tr>
<tr>
<td></td>
<td>Defendant goes outside to decedent’s father’s car without either of her children.</td>
</tr>
</tbody>
</table>
Defendant returns to room #214 with food.

20:10 Defendant walks outside 20-month-old child to meet with decedent’s father. She does not have the decedent.

20:17 Defendant, W8 and 20-month-old child return to hotel. They do NOT have the decedent.
<table>
<thead>
<tr>
<th>Time</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>20:18</td>
<td>Defendant, 20-month-old child and W8 leave the Room#214. They do not have the decedent.</td>
</tr>
<tr>
<td>20:27</td>
<td>Defendant, 20-monthold child and W8 return to room with cup of ice.</td>
</tr>
</tbody>
</table>
21:51  Defendant, 20–month-old child and W8, without decedent, leave room
and go outside to decedent’s father car.

22:03  Defendant, 20-month-old child and W8, without decedent, return to room
#214.
<table>
<thead>
<tr>
<th>FEBRUARY 3, 2020 MONDAY</th>
<th>8:34</th>
<th>Defendant walks W8 outside to father’s car. Neither the decedent nor 20-month-old child is with her.</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>12:34</td>
<td>Defendant is at elevator and carries the decedent whose head is flopped on defendant’s shoulder and the 20-month-old is walking behind. They leave and get in decedent’s father’s car.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>DEFENDANT AND CHILDREN ARE NOT IN HOTEL FOR OVER 24 HOURS.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Decedent’s father stated they were at Marlow Six Movie Theater; however, detectives were unable to locate any CCTV to support this, and FBI did a CAST analysis (cell tower search) which did not show decedent’s father in the area that he claimed he was.</td>
</tr>
<tr>
<td></td>
<td>19:18</td>
<td>Decedents’ father brings defendant back to hotel and defendant has the 20–month-old child. <strong>There are no signs of the decedent.</strong></td>
</tr>
</tbody>
</table>
19:34  Defendant returns to decedent’s fathers’ car with a back pack and 20-month-old child.
<table>
<thead>
<tr>
<th>Date</th>
<th>Time</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>February 4, 2020</td>
<td>20:07</td>
<td>Decedent’s father drops defendant back to hotel and defendant is carrying the decedent, who still appears to be limp and lifeless. The 20-month-old child stands next to the defendant.</td>
</tr>
<tr>
<td>February 5, 2020</td>
<td></td>
<td>No sighting of the decedent all day.</td>
</tr>
<tr>
<td></td>
<td>16:41</td>
<td>Defendant goes to a neighbor’s door, returns to room one minute later.</td>
</tr>
<tr>
<td></td>
<td>19:48</td>
<td>Defendant takes 20-month-old child to get food at hotel cafeteria.</td>
</tr>
<tr>
<td>Time</td>
<td>Description</td>
<td></td>
</tr>
<tr>
<td>--------</td>
<td>-----------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>19:49</td>
<td>Defendant walking in lobby with 20-month-old child, she does not have the decedent.</td>
<td></td>
</tr>
<tr>
<td>19:52</td>
<td>Defendant returns to room #214 with 20-month-old child.</td>
<td></td>
</tr>
<tr>
<td>22:54</td>
<td>Defendant carries 20-month-old child to decedent’s fathers’ car. Decedent is not with the defendant.</td>
<td></td>
</tr>
<tr>
<td>Time</td>
<td>Description</td>
<td></td>
</tr>
<tr>
<td>--------</td>
<td>--------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>23:06</td>
<td>Defendant returns to room #214 with 20-month-old child.</td>
<td></td>
</tr>
</tbody>
</table>
Defendant carries decedent to decedent’s father’s car. Decedent is completely covered in a pink blanket. 20-month-old child is walking behind the defendant.
<table>
<thead>
<tr>
<th>Time</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>14:35</td>
<td>Defendant carries decedent wrapped in a blanket into Children’s National Medical Center.</td>
</tr>
<tr>
<td>Time</td>
<td>Event</td>
</tr>
<tr>
<td>----------</td>
<td>----------------------------------------------------------------------</td>
</tr>
<tr>
<td>14:42</td>
<td>Decedent is pronounced dead.</td>
</tr>
<tr>
<td>15:02</td>
<td>MPD arrives at CNMC.</td>
</tr>
<tr>
<td>17:26 – 19:57</td>
<td>Defendant comes to MPD with Detective Howard and officer but the defendant asked to go to the store and left the police station and never came back.</td>
</tr>
<tr>
<td>19:00</td>
<td>Detective Green interviews decedent’s father.</td>
</tr>
</tbody>
</table>
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION

COMPLAINT

District of Columbia ss:

Defendant's Name: Ta'Jeanna Eason

(First) (Middle) (Last)

20653489

Also Known As:

(First) (Middle) (Last)

Address: 935 Division Ave, NE Apt. 6, Washington DC

On or about April 1, 2020, within the District of Columbia, Ta'Jeanna Eason did torture, cruelly beat, abuse and otherwise willfully maltreat G.E., a child under the age of eighteen years, that is, about two years of age. (Cruelty To Children, in violation of 22 D.C. Code, Section 1101 (2001 ed.))

Ta'Jeanna Eason, within the District of Columbia, in perpetrating and attempting to perpetrate the crime of First Degree Cruelty to Children, killed G.E. by torturing, beating, abusing, neglecting him with her hands, neglect, and maltreatment on or about April 1, 2020, thereby causing injuries from which G.E. died on or about April 1, 2020. (First Degree Murder - Felony Murder, in violation of 22 D.C. Code, Section 2101 (2001 ed.).)

Co-Defendants:

Subscribed and sworn to before me this 22nd day of October, 2020

Anthony D. Greene

Affiant's Name

WARRANT

To The United States Marshal or any other authorized federal officer or the Chief of Police of the District of Columbia:

WHEREAS the foregoing complaint and affidavit supporting the allegations thereof have been submitted, and there appearing probable cause and reasonable grounds for the issuance of an arrest warrant for

YOU ARE THEREFORE COMMANDED TO BRING THE DEFENDANT BEFORE SAID COURT OR OTHER PERSON ENUMERATED IN 18 U.S.C. 3041 forthwith to answer said charge.

Issued October 22, 2020

Judge Jonathan H. Pittman

Title 16: □ Rule 105: □ Judge:

Sex: Female DOB: 08/19/1989 CCN: 20653489 PDID:

Paperng Office: Det. Anthony Greene Badge No.: D2-1515

OFFICER MUST EXECUTE RETURN

Officer's Name: AUSA Signature: Date / Time: October 17, 2020

Fel. I Fel. II AFTC
Exhibit C p. 002

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
<thead>
<tr>
<th>DEFENDANT'S NAME</th>
<th>NICKNAME</th>
<th>ALIAS(S)</th>
<th>CN#:</th>
<th>FD#:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Ta'Jeanna EASON</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

SEX      | RACE | DOB | HGT | WGT | EYES | HAIR | COMPL | SCARS, MARKS, TATTOOS |
<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Female</td>
<td>Black</td>
<td>8/19/1989</td>
<td>Link</td>
<td>Link</td>
<td>Brown</td>
<td>Black</td>
<td>Unknown</td>
<td>Unknown</td>
</tr>
</tbody>
</table>

DEFENDANT'S HOME ADDRESS: 1361 Division Ave NE, #69, Washington, DC 20019

<table>
<thead>
<tr>
<th>COMPLAINANT'S NAME</th>
<th>TELEPHONE NUMBER</th>
</tr>
</thead>
<tbody>
<tr>
<td>G.E.</td>
<td>(202) 491-1408</td>
</tr>
</tbody>
</table>

LOCATION OF OFFENSE: 935 Division Ave NE, #57, Washington, D.C. 20019

DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:25 a.m.

CAUTION AND MEDICAL CONDITIONS (C&M):
Select a valid C&M code below for warranted person when using caution indicators.

<table>
<thead>
<tr>
<th>C&amp;M Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>60</td>
<td>Armed/Hostile</td>
</tr>
<tr>
<td>65</td>
<td>Violent Tendencies</td>
</tr>
<tr>
<td>70</td>
<td>Sexual/Abuse Victim</td>
</tr>
<tr>
<td>75</td>
<td>Deviant</td>
</tr>
<tr>
<td>80</td>
<td>Medication Required</td>
</tr>
<tr>
<td>85</td>
<td>Hemophilia</td>
</tr>
<tr>
<td>86</td>
<td>Other (Explain)</td>
</tr>
<tr>
<td>90</td>
<td>Diabetes</td>
</tr>
<tr>
<td>95</td>
<td>Allergies</td>
</tr>
<tr>
<td>100</td>
<td>Known to use drugs</td>
</tr>
</tbody>
</table>

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

The evidence and information contained in this affidavit describes how defendants Ta'Jeanna EASON and Antonio TURNER collectively and chronically inflicted injury upon their three children, including a two-year-old G.E., who died at their hands. Through their actions and inactions, in situations where they knew or should have known that the two-year-old decedent and his three-year-old brother, I.E., required immediate medical attention, they failed to properly care for the children and caused the injuries to G.E. that led to his death. Throughout the past year, each of the three children were abused, eventually leading to G.E.’s death. In the week prior to G.E.’s death, EASON and TURNER had exclusive care, custody, and control of the children and neither parent reported any injuries or accidents to any of the children. Specifically, in the last days of G.E.’s life, EASON and TURNER failed to seek medical treatment or assistance for G.E. or his injured brother, I.E., only calling after G.E. was found dead on April 1, 2020. Based on all of the evidence, the defendants are being charged with First Degree Cruelty to Children and Felony Murder.

EMERGENCY RESPONSE:

1. On Wednesday, April 1, 2020, at approximately 8:25 a.m., members of the Sixth District, Metropolitan Police Department (MPD), were dispatched to 935 Division Avenue, Northeast, Washington, D.C., Apartment 6, to investigate the report of an unconscious person. Once on the scene, the officers discovered D.C. Fire and Emergency Medical Services (EMS) personnel conducting life-saving efforts on an unconscious child. When EMS personnel arrived, Ta’Jeanna Eason and Antonio Turner were already present, both claiming they were the parents of the children.

AFFIANT’S SIGNATURE: X Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jeanna Eason

CHARGED WITH:
- First Degree Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY
- NCPA APPROVED 2006

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF OCTOBER, 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Dates 11-29-06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: Ta’Jeanna EASON
SEX: Female
RACE: Black
DOB: 08/19/1989
HEIGHT: Unit:
WEIGHT: Unit:
EYES: Brown
HAIR: Black
NICKNAME:
ALIAS:
CON:
DATE:
PLACE:
SCARS, MARKS, TATTOOS:

COMPLAINTANT’S NAME: G.E.
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20001
DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:25 hours

CAUTION AND MEDICAL CONDITIONS (CMC):
Select a valid CMC code below for wanted persons when using the caution indicator.

10 = Armed and Dangerous
25 = Escape Risk
30 = Sexually Violent Predator
10 = Marital Rape Expert
15 = Explosive Expert
55 = Offender
60 = Medication Required
65 = Methamphetamine
70 = Sexually Violent Predator
90 = Diabetic

Give a brief description of what happened:

arrived on the scene, they noted that the unconscious child’s extremities were cold. There was visible signs of trauma, and no dependent level or rigor mortis. After all life-saving measures failed, the decedent was pronounced dead on the scene at 8:43 a.m. The decedent’s remains were subsequently transported from the scene to the D.C. Office of the Chief Medical Examiner (OCME), where an autopsy was performed to determine the cause and manner of death.

2. The decedent has been identified as G.E., with a date of birth of December 12, 2017.

3. The child’s mother, Ta’Jeanna EASON, DOB: 08/19/1989, told first responders that the last saw the child between 10:00 p.m. and 11:00 p.m. (the previous night) and stated that her husband left for work at 5:30 a.m.

4. As a result of this investigation, members of MPD’s Special Victim’s Unit were requested to respond and assume investigative responsibilities. Your affiant interviewed responding Officer L. Fogle, who reported that upon entering the residence, D.C. Fire/EMS personnel were actively engaged in life-saving measures. Also present in the home were the decedent’s biological mother (EASON), her eleven-year-old son M.E., and her three-year-old son I.E. Officer Fogle reported that while on scene, EASON stated words to the effect of “YOU KILLED YOUR BROTHER” in the direction of her eleven-year-old son M.E.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta’Jeanna Eason
Charged with First-Degree Murder for the Murder of a Child
ASSISTANT UNITED STATES ATTORNEY

X Anthony D. Greene
AFFIANT’S SIGNATURE:

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October, 2020
(JUDGE) DEPUTY CLERK, SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-06
Exhibit C p. 004

Superior Court of the District of Columbia  
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT  
USW NO.: 28-05389

DEFENDANT'S NAME: Ta'leanna Eason  
SEX: Female  
RACE: Black  
DOB: 8/19/1999  
HEIGHT: 5'10"  
WEIGHT: 180 lbs  
EYES: Brown  
HAIR: Black  
COMPLIMENTARY NAME:  
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:  
935 Division Ave NE, #6 Washington, D.C. 20009

TELEPHONE NUMBER: 301-491-1668

COMPLAINT'S NAME:  
G.E.

POLICE NUMBER:  
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20009

DATE OF OFFENSE: April 1, 2020  
TIME OF OFFENSE: 5:25 a.m.

CAUTION AND MEDICAL CONDITIONS (CMC):  
Select a valid CMC code below for each condition using the caution indicator.

60 = Armed and Dangerous  
65 = Ugly  
66 = Other (Explain):  
25 = Escape Risk  
10 = Scoliosis  
35 = Alopecia

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

5. Officers on scene also discovered that EASON's husband, Antonio TURNER, DOB: 05/23/1992, resided at the location and they were told that he had left for work that morning at 6:30 a.m. EASON was asked what happened and replied, "If you really want to know what happened, I truthfully believe he did it while pointing to M.E., who was in the hallway." EASON then yelled out, "He's evil." EASON was asked if other kids had injuries and she stated, "My son has a scratch" while pointing to the left side of three-year-old L.E.'s head. She made no mention of any other injuries and stated L.E. was sleepy.

6. MPD Officer J. Alexander, one of the first responding officers to the scene and observed (on scene) a bump on the center of L.E.'s forehead and asked if he had always been there. EASON replied no. Officer Alexander then observed L.E.'s eyes roll back into his head while being held by EASON, as if he was going in and out of consciousness. EASON put L.E. beside her on the couch and yelled out, "My son does not act this way," speaking about L.E. D.C. Fire/EMS was called back to assist L.E. Officer Alexander began to rub L.E.'s sternum to prevent him from falling asleep or passing out, fearing he may have a head injury. L.E. appeared groggy, but started to respond and cry a little. EASON then had L.E. stand up and took him to the bathroom. She said he was OK and that he was just sleepy. Officer Alexander asked for assistance from the EMS personnel on the scene.

7. Your affiant, who was assigned as the lead detective on this investigation, later learned from MPD's Youth and Family Services Division (YFSD) Detective Jerry Akin that D.C. Fire/EMS Paramedic O'Bryne had noted on the

TO: WARRANT CLERK  
PLEASE ISSUE A WARRANT FOR:

Ta'leanna Eason  
Charge: 2nd Deg. Murder-Future Murder (Wounds to Child)

ASSISTANT UNITED STATES ATTORNEY  

FORM CD(73-109)  
JUDGE APPROVED

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October 2020

(UNITED STATES DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revolution Date 05-05-06
Exhibit C p. 005

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Ta'Jeanna Eason
NICKNAME: EASON
ALIASES: Unknown
SEX: Female
RACE: Black
DOB: 8/19/1989
HEIGHT: 5'7
WEIGHT: 130
EYES: Brown
HAIR: Black
COMPL: Mod
SCARS, MARKS, TATTOOS: Unknown
TDD: Unknown

DEFENDANT'S HOME ADDRESS:
1234 Division Ave NE, 68 Washington, DC 20019

COMPLAINANT'S NAME:
G.E.

LOCATION OF OFFENSE:
915 Division Ave NE, 68 Washington, D.C. 20019

DATE OF OFFENSE:
April 12, 2020
TIME OF OFFENSE:
8:25 AM

CAUTION AND MEDICAL CONDITIONS (CMC):
Select a valid CMC code below for worst person when using the caution indicator.

60 = Armed and Dangerous
25 = Serious Risk
50 = Sexually Violent Predator
60 = Heinous

30 = Seizure
10 = Sexual
50 = Other (Explosive)
35 = Drug

PATIENT'S MEDICAL CONDITIONS:
65 = Epilepsy
30 = Seizure
55 = Alcoholic
60 = Allergies

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Scene at the decedent sustained multiple system trauma which was consistent with physical abuse. Further, OThyme's subsequent report indicates that EASON told them that M.E. should be questioned because she believed that M.E. was a direct cause of the child's cardiac arrest.

8. Your affiant also learned that during the 911 call, EASON reported to the operator that G.E. was unconscious and unresponsive and that he had visible and obvious trauma to his body. Over the course of the call, EASON instructed M.E. to perform cardiopulmonary resuscitation (CPR) on the decedent because she was physically unable to do so. Over the duration of the 911 call, EASON never stated that she believed M.E. (or anyone else) was responsible for G.E.'s injuries.

9. As lead detective, your affiant went to the scene, personally observed the decedent's remains, and saw both old and new trauma to the decedent's head and torso, which included apparent scratches, bruises, and abrasions.

AUTOPSY

10. On April 2, 2020, Dr. Sasha BRELAND, OCME Deputy Medical Examiner, conducted the decedent's postmortem forensic examination. At the conclusion of the examination, the following injuries were noted: abrasions and contusions to the head, face and torso; contusions to the heart and lungs; acute abdominal injuries.

AFFIANT'S SIGNATURE:

x. Anthony D. Goans

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jeanna Eason
Charged With First Degree Murder, Second Degree Murder, Knowledge of Noxious Trends

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-16

Form CR(71)-067

NCIC APPROVED

Form CR(71)-067

Revision Date: 11-29-16
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: In Jeanna Eason
NICKNAME: 
ALIAS(S): 
CIVIL DISABILITY 
CUN: 20/058159
PHN: 
SEX: Female
RACE: Black
DOB: 8/19/1989
HEIGHT: 140 lbs
WEIGHT: Brown
HAIR: Unknown
COMPL: 
SCARS, MARKS, TATTOOS:

DIFFENDANT’S HOME ADDRESS:
LGA 933 Division Ave NE, #6 Washington, DC 20019
TELEPHONE NUMBER: (202) 491-1408

COMPANY NAME:
DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
8:25 Hours

LOCATION OF OFFENSE:
933 Division Ave NE, #6 Washington, DC 20019

CAUTIONARY MEDICATIONS (CMC):
Select a valid CMC code below for wanted person which using the caution indicator.

   00 = Armed and Dangerous
   05 = Violent Tendency
   09 = Mental Illness
   10 = Mental Illness
   15 = Explosive

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

consisting of hemorrhaging of the soft tissue of the abdomen; liver laceration; right kidney laceration; multiple bilateral posterior rib fractures and healing fractured ribs; and a small subdural hematoma to the left side of the brain. Dr. BRELAND ruled the decedent’s cause of death was multiple blunt force injuries and the manner of death was ruled a homicide.

11. On July 10, 2020, Dr. Breland issued the Autopsy Report for G.E. in which she detailed the following specific injuries to him:

   Multiple Blunt Force injuries

   Head and central nervous system:

   1. Marked swelling of head
   2. Bilateral periorbital ecchymoses
   3. Abrasions and contusions associated subscapular hemorrhages
   4. Left temporalis muscle hemorrhage
   5. Chipping (fracture) of outer table of frontal bone
   6. Left subdural hemorrhage, scant
   7. Neuropathology and Ophthalmic pathology consultations; refer to separate MedStar
   8. Georgetown University Hospital Pathology Consultation Reports

   Mild diffuse brain swelling and edema with diffuse amyloid precursor protein staining

AFFIANT’S SIGNATURE:

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Ta’Jeanna Eason

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd October 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD129-1039

Revision Date: 5-29-65
Exhibit C p. 007

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
<thead>
<tr>
<th>DEFENDANT'S NAME</th>
<th>NICKNAME</th>
<th>ALIAS(es)</th>
<th>USW NO.:</th>
</tr>
</thead>
<tbody>
<tr>
<td>NAME</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>SEX: Male</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>RACE: Black</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>DOB: 8/19/1989</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HGT: Unknown</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>WGT: Unknown</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>EYES: Brown</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>HAIR: Black</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COMPL: Unknown</td>
<td></td>
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<tr>
<td>SCARS, MARKS, TATOS:</td>
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</table>

DEFENDANT'S HOME ADDRESS:
LKA 911 Division Ave. NE, #5 Washington, DC 20019

COMPLAINT NUMBER:
(Telephone Number: 202-491-1688)

LOCATION OF OFFENSE:
911 Division Ave NE, #5 Washington, DC 20019

DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 5:35 AM

GUARDIAN OF MINOR:
(Telephone Number: 202-491-1688)

DATE OF OCCURRENCE:
April 1, 2020

TIME OF OCCURRENCE:
5:35 AM

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for persons who use the creative indicator:

- 25 = Excessive Fear
- 60 = Bullying
- 70 = Suicide
- 80 = Destroyed
- 85 = Hemorrhage

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

- Goof of the corpus callosum (associated with trauma)
- Mild vitreous hemorrhage, bilateral
- Not intoxicated or under the influence of any drug

Exhibit 9

- Hemorrhagic encephalopathy
- Blunt abdominal trauma
- Blunt head trauma
- Blunt fracture – 31 of injuries to extremities were leading with 1
- Fracture of comminuted cranial
- Posterior intracranial hemorrhage
- Various contusions and subdural hemorrhage (Dr. Davis examined and found hemorrhage, which, in my opinion, was caused by trauma)
- Hemorrhage of the brain (healed and multiple bruises)
- Hemorrhage of the blood vessels (healed and multiple bruises)
- Hemorrhage of the liver (healed and multiple bruises)
- Hemorrhage of the kidneys (healed and multiple bruises)
- Hemorrhage of the spleen (healed and multiple bruises)
- Hemorrhage of the lung (healed and multiple bruises)
- Hemorrhage of the heart (healed and multiple bruises)
- Hemorrhage of the bone marrow (healed and multiple bruises)

AFFIDAVIT SIGNATURE:

[Signature]

TO THE WARRANT CLERK:
PLEASE ISSUE A WARRANT FOR:

[Signature]

[Signature]
Exhibit C p. 008

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Tu'Jeanna Eason
SEX: Female
RACE: Black
DOB: 8/19/1999
HEIGHT: Unit
WEIGHT: Unit
EYES: Brown
HAIR: Black
COMPLAINTS:
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
935 Division Ave NE, #6 Washington, DC 20019

COMPLAINANT'S NAME:

LOCATION OF OFFENSE:
935 Division Ave NE, #6 Washington, D.C. 20019

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
8:25 hours

CAUTION AND MEDICAL CONDITIONS (CMC):
Select a valid CMC code below for waived persons when using the caution indicator.

- 05 = Arresting and Dangerous
- 08 = Violent Tendencies
- 10 = Habitual Drug User
- 15 = Explosive Offender
- 25 = Escape Risk
- 30 = Sexually Violent Predator
- 40 = Seizure
- 65 = Drowsy
- 81 = Other

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

12. Bilateral aperistaltic cord hemorrhages
13. Bowel contusions

Dr. Breland noted that there were striations or linear depressions on the back of G.E.'s head. She also noted that there were signs of early scarring on some of the injuries which were less than 24 hours. There were cuts to G.E. on the face and on the left neck. There was blunt trauma to his genitalia, as at this time, there is no evidence of a sexual assault. There were purple abrasions and there were bruise marks with a pattern around the child’s nipple area as well as on the back of the head. There was injury to the liver and kidney which indicated that he sustained significant blunt trauma to the abdomen. Dr. Breland opined that G.E.'s right flank appeared to have been punched, kicked, slapped or hit with an object(s). There was injury to the child's heart and inferior vena cava. This type of injury could occur when a child is punched or hit in the chest. In Dr. Breland's opinion, the main cause of death was the significant head and abdominal trauma.

BACKGROUND AND INITIAL MPD INVESTIGATION

13. Tu'Jeanna Eason is the biological mother of three children who were found injured on April 1, 2020. Antonio Turner is not the biological father of these children. Turner and Eason have had a romantic relationship for approximately one year and represented that they were married. They have lived together at the

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Tu'Jeanna Eason

ASSISTANT UNITED STATES ATTORNEY

AFFIANT'S SIGNATURE:
X. Anthony D. Greene

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd Day of October 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Exhibit C p. 009

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Jeanna Eason
SEX: Female
RACE: Black
DOB: 10/21/1985
HIE: Link
WGT: Unk.
EYES: Brown
HAIR: Black
COMPLAINT'S NAME: G.E.
LOCATION OF OFFENSE: 923 Division Ave NE, #6, Washington, D.C. 20014
CAUTION AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for wanted person when using the reason indicator.

- "00 = Armed and Dangerous"
- "25 = Escape Risk"
- "03 = Visible Tendence"
- "99 = Sexually Violent Predator"
- "10 = Martial Arts Expert"
- "50 = Heart Condition"
- "13 = Explosive Expertise"
- "35 = Alcoholic"

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Division Avenue two-bedroom apartment since that time with three minor children, M.E., I.E., and G.E. In addition, on April 1, 2020, EASON was approximately nine months pregnant with TURNER's child. That child later died of natural causes.

14. On or about April 1, 2020, EASON and TURNER had exclusive care and custody of the three minor children.

15. Following the initial on-scene investigation, EASON and her children (I.E. and M.E.) were transported Division Avenue to the Sixth District Station by MPD Detective George Taylor and Chand Howard. TURNER arrived separately at the Sixth District Station.

16. As MPD Detectives gathered information about G.E.'s death, EASON, TURNER, and M.E. were interviewed. While at MPD's Sixth District Station, both EASON and TURNER were questioned about the events. While EASON was being interviewed, her son I.E. was sitting next to her in a chair. It was apparent that I.E. was having difficulty staying awake or alert and was slumping backward. EASON tried to make him sit up straight. During this time, I.E. had to use the station restroom and could barely walk - moving sideways and slowly. At one point, TURNER had to carry him to the bathroom.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Jeanna Eason

ASSISTANT UNITED STATES ATTORNEY

Signed and sworn before me this 22d DAY of October 2020.

(JUDGE) (DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-20-06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Jeanna Rason

ATTACH COPY OF COURT ORDER TO ISSUE WARRANT

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October 2020

(MJUDE) DEPUTY CLERK, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revolution Date: 11-29-20
Superior Court of the District of Columbia

CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Ta'Jeanna FASON
NICKNAME: Unknown
AGE: 32
SEX: Female
RACE: Black
DOB: 8/19/1989
HEIGHT: 5'6
WEIGHT: 190
EYES: Brown
HAIR: Black
COMPLAINED: Med
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
935 Division Ave NE, Apt 201, Washington, DC 20019

COMPLAINTED'S NAME:
G.E.

LOCATION OF OFFENSE:
935 Division Ave NE, Apt 201, Washington, DC 20019

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
8:33 a.m.

CAUTION AND MEDICAL CONDITIONS (CNCS)

Select a valid CNCS code below for marked person when using the caution indicator.

- 00 = Agitated and Dangerous
- 05 = Escape Risk
- 10 = Violent Tendency
- 15 = Sexually Violent Predator
- 20 = Substance Abuse
- 25 = Explosive Expertise
- 30 = Traumatic Brain Injury
- 35 = Alcoholic
- 40 = Epilepsy
- 45 = Hearing Impairment
- 50 = Diabetic
- 55 = Allergies
- 60 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Right to change his siblings' diapers and, if in the morning the children's diapers were wet, he would get beaten. M.E. stated that her brother spent time resting because she was pregnant. He explained that in the past, he had been thrown through a glass door and required stitches by FASON's prior boyfriend. M.E. also disclosed that two or three weeks earlier, TURNER hit him and gave him a black eye.

20. In addition, YPSD Detective A{t}j{t} {t}old your affiant that while M.E. was being screened by the CNMC medical staff, M.E. disclosed that her stepfather Antonio [TURNER], hit him and his brothers. In addition, M.E. stated that his stepfather [TURNER] previously hit him in the eye, in the chest and with a belt.

21. Later on April 1, 2020, FASON was informed by a CPSA Social Worker that, based on the unexplained injuries to both M.E. and I.E., the children were being temporarily removed from her care and placed in foster care through CPSA.

22. As indicated above, at the time of G.E.'s death, FASON was pregnant with TURNER's child. The child was born on or about April 7, 2020, but died soon thereafter.

AFFIANT'S SIGNATURE: 
X Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jeanna Fason

ASSISTANT UNITED STATES ATTORNEY

22nd October 2020

SUBSCRIBED AND SWORN BEFORE ME THIS

JUDGE DEPUTY CLERK
SUPREME COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-2020
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME:
Jean EASON

SEX:
Female

RACE:
Black

DOB:
8/19/1989

HEIGHT:
Unknown

WEIGHT:
Unknown

EYES:
Brown

HAIR:
Black

COMPL.
Med.

SKU:
EARLY, MARK, TAYLOR

COMPLAINT’S NAME:
G.E.

LOCATION OF OFFENSE:
953 Division Ave NE, #6 Washington, D.C. 20019

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
8:25 AM

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for named person who uses the_resource indicator.

00 = Arrested Suspect
10 = intently
20 = Deadly

SEVERITY OF INJURY:
60 = Injuries

30 = Minor

40 = Moderate

50 = Serious

90 = Injuries

GAVE A BRIEF DESCRIPTION OF WHAT HAPPENED.

23. On April 1, 2020, Detectives Chad Howard and George Taylor interviewed EASON about the death of her son, G.E. The interview occurred at MPD’s 6th District Station. EASON reported that at approximately 8:30 AM she woke up and went to check on LE and G.E. When she went to the bedroom, she observed LE looking at television and G.E. appeared to be asleep. EASON stated that she called G.E.’s name, but he did not answer. She then observed a bruises on LE’s face and asked M.P. what happened. EASON reported that M.P. said something about them playing and had LE get hurt. EASON said she returned to the bedroom and asked that G.E. did not wake up to the sound of his name and she went to check on him. She said that when they reached him, he was limp and cold to the touch. EASON said she told M.P. to pick up G.E. while she called TURNER on the phone. EASON said that when TURNER did not answer, she called 911 for emergency assistance. EASON then ordered M.P to perform CPR on G.E.

24. EASON told the Detectives that sometimes after G.E. turned a year old, she stated to notice bruises on him and further explained that she stated to notice the bruises on G.E. after she saw TURNER. EASON stated that she initially thought TURNER was responsible for the injuries, but then realized that the injuries happened when TURNER wasn’t around, so she believed they were from M.P. EASON recalled that on one occasion, when she observed bruises to G.E., she told TURNER questioned M.P. about how G.E. was injured. EASON reported that

Affiant’s Signature:

*Anthony D. Jones

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Jean EASON

Charge:
May be removed by Order of Superior Court for Children

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN TO BEFORE ME THIS 22nd day of October 2020.

JUDGE EMPIRE CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Exhibit C p. 013

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

Nome: Ta'Jeanna Eason

SEX: Female
RACE: Black
DOB: 8/10/1989
HEIGHT: 5'7"
WEIGHT: 150 lbs
EYES: Brown
HAIR: Black
COMPL: Mod
SCARS, MARKS, TATTOOS: None

DEFENDANT'S HOME ADDRESS:
LKA 335 Division Ave NE, #5 Washington, DC 20019

COMPLAINT'S NAME:
G.E.

LOCATION OF OFFENSE:
935 Division Ave NE, #5 Washington, D.C. 20019

DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
8:25 hours

CAUSATION AND MEDICAL CONDITIONS (If any)

Select a valid CIC code below for wounded person while using caution indicator.

11 - Assault with gun
12 - Assault with knife
13 - Assult with glass
14 - Assault with other dangerous weapon
21 - Escape Risk
30 - Sexually Violent Predator
31 - Sex Crime
32 - Domestic
40 - Mental Illness
50 - Suicide
60 - Bipolar
70 - Schizophrenia
80 - Epilepsy
90 - Environmental

M.E. said he wasn't responsible for the injuries and was unaware how G.E. got injured.

25. EASON stated that on another occasion, she observed what she described as a "slight bruise" on G.E. and she confronted TURNER and M.E. about the injury. EASON said that M.E. disclosed that TURNER was responsible for the injuries. EASON told the Detectives that shortly after that disclosure by M.E., she placed a surveillance camera in the children's bedroom. EASON then said that she later removed the camera from the room after the children continued to play with the electrical cord.

26. EASON continued that after the two aforementioned instances, the unexplained injuries and bruises on G.E. stopped for a short period of time. EASON said she then noticed bruises that appeared to get worse. EASON also reported that on August 30, 2019, G.E. sustained a black left eye, which she thought was due to an allergic reaction. EASON said she took G.E. to Prince George's Hospital for treatment and was informed by a member of the hospital staff that G.E.'s injury was caused by being struck by someone. EASON said she confronted TURNER and M.E. regarding the injury to G.E.'s eye and that M.E. admitted to slapping G.E. because he wouldn't stop crying, although EASON also thought that TURNER might have been responsible for G.E.'s black eye. Specifically, EASON told the Detectives that M.E. said he slapped G.E. because he would not stop crying. EASON continued.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charges:
7th Dist, Murder-Priety Murder (Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

Affiant's Signature:
X Anthony D. Greene

Subscribed and Sworn Before Me This 22nd Day of October 2020

(JUDGE) DEPUTY CLERK
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Exhibit C p. 014

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: 
Ta'Jeanna Eason

SEX: Female
RACE: Black
DOB: 8/19/1989
HEIGHT: Unknown
WEIGHT: Unknown
EYES: Brown
HAIR: Black
COMPLEXION: Medium
SCARES, MARKS, TATTOOS: Unknown

DEFENDANT’S HOME ADDRESS: 
1100 343 Division Ave NE, #6 Washington, DC 20019

COMPLAINT’S NAME: 
G.E.

LOCATION OF OFFENSE: 
935 Division Ave NE, #6 Washington, D.C. 20019

DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:25 a.m.

CAUTION AND MEDICAL CONDITIONS (CMC): 
Select a valid CMC code below for wanted person when using the caution indicator.

- 01 = Armed and Dangerous
- 25 = Escape Risk
- 05 = Violent Tendencies
- 30 = Sexually Violent Predator
- 10 = Mental Health Condition
- 01 = Medication Required
- 15 = Explosive Personality
- 85 = Known to take drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Do I beat this w/o. Yes. I did. I didn’t like see him up to the point where he—your house, but yes, I was mad. I was in, as a matter of fact, that was the time where he tried to blame Antonio for his eye, and that was impossible because Tony was in the room with me.”

27. EASON stated that she and TURNER have both disciplined the children, but nothing more than a spanking or a smacking on the hand or buttocks. EASON said she thinks her son had something to do with G.E.’s death. EASON stated she is a religious person who feeds and knows things and believes that M.E. “isn’t right.”

28. During the interview, EASON did not reveal to MPD that TURNER had hit the children in the past, even though MPD subsequently found a text message between EASON and TURNER where EASON asked TURNER why he hit one of her son’s so hard.

29. EASON told the Detectives that in the past, she had seen M.E. hit I.E. In response, she said she grabbed M.E. and threw him to the ground and smacked him on the face and head. EASON thought her son was “snaky” and “evil.” She further explained that she checked both G.E. and I.E. the day before (on March 31, 2020, as late as 10:30 p.m.), as well as two days before then. She claimed that neither had any visible injuries or COVID and that everything was fine.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta’Jeanna Eason

ASSISTANT UNITED STATES ATTORNEY

22nd October 2020

AFFIDANT’S SIGNATURE:

Anthony D. Gacev

SUBSCRIBED AND SWORN BEFORE ME THIS 
22nd DAY OF 
22nd Day of October 2020

(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE 
DISTRICT OF COLUMBIA

Revision Date 09-09-06
EXHIBIT C p. 015

Superior Court of the District of Columbia
Criminal Division

Affidavit in Support of an Arrest Warrant

Defendant’s Name: Eason
Sex: Female
Race: Black
DOB: 08/04/1989
Height: 5’6”
Weight: 130 lbs
Hair: Black
Eyes: Brown

Complaint’s Name:

Location of Offense:

Date of Offense: April 1, 2020
Time of Offense:

Description of Offense:

50. Eason admitted that she disciplined all of her kids, including G.L., who was the youngest, but claimed she did not get too much physical discipline. Eason further admitted that she would “pop” his hands, pop his legs, or just say “a little boy don’t do that.” Eason stated that she didn’t really discipline A.L. for L.H. because they were small. She said, “if they do that, it’s like a pop on a pluck or they for the most part I’m looking, across the house.” Eason denied using a belt.

51. On April 1, 2020, Antonio Turner was interviewed by MPD Detectives Chand Howard and George Taylor at MPD’s Sixth District Station. Later that same day, he was interviewed by your affiant and MPD Detective David Dalencourt at the Homicide Branch. Turner reported that he has been involved with and married to Eason for about a year. Turner reported that he is not the biological father of the decedent or his siblings.

52. Turner stated that he and his wife left the house in the early morning hours (around 7:00 a.m.) on March 31, 2020, to take Eason to a doctor’s appointment at George Washington University Hospital, leaving the children unattended by an adult, with three-year-old L.I. and two-year-old G.L. in the care of 11-year-old M.B. Turner reported that he believed his wife would be giving birth to their child, so he quickly went to the store to pick up food and household goods before going home to check on the children. Turner indicated that they had arranged to

To: Warrant Clerk

Please issue a warrant for:

[Signature]

Assistant United States Attorney

Subscribed and Sworn Before Me:

[Signature]

Cash, October 20, 2020

Judge Deputy Clerk, Superior Court of the District of Columbia

[Signature]
Exhibit C p. 016

Superior Court of the District of Columbia
Criminal Division

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: EASON
NICKNAME: T.J.
ALIAS: EASON
CON#: 20-0533189
JUDGMENT: Black
DOB#: 8/19/1989
HEIGHT: Unknown
WEIGHT: 150 lbs
EYES: Brown
HAIR: Black
CLOTHES: Unknown
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT’S HOME ADDRESS: 935 Division Ave NE, #6 Washington, DC 20019

COMPLAINANT’S NAME: G.I.
COMPLAINANT’S ADDRESS: 935 Division Ave NE, #6 Washington, DC 20019
TELEPHONE NUMBER: (202) 491-6665

LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, DC 20019
DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:25 hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for a wanted person when using the caution indicator.

- 20 = Arrest and Dangerous
- 25 = Escape Risk
- 30 = Sexually Violent Predator
- 50 = Hour Condition
- 60 = Medication Required
- 70 = Diabetic
- 75 = Alcoholic
- 90 = Tetanus

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

COMMUNICATE WITH M.E. BY PHONE, BUT HAD NOT BEEN ABLE TO REACH HIM.

33. TURNER reported that when he arrived home, he found M.E. in the living room with the decedent (G.F.). TURNER said his weight bar (which he described as a skinny ten pound metal bar) was on the sofa next to the decedent. Your affidavit notes that on the scene, there was also a small pull-up bar which weighed twenty-five pounds. TURNER stated that in the past, he had asked M.E. not to handle the weight bar. TURNER became upset and said he attacked the decedent’s hand and struck M.E. in the head and kicked him in the body. TURNER stated he did not want to discipline M.E. and G.E. TURNER also stated that he checked in the children’s bedroom and observed M.E. holding his head. TURNER did not attempt to get any medical assistance for M.E. and left the apartment and went to the hospital. TURNER added that before leaving, he grabbed his “medicine” (marijuana to treat his ADHD) and went to the hospital.

34. TURNER continued that later that afternoon (March 31), he returned home with EASON. TURNER said he told M.E. to feed his brothers and then went to the bedroom to watch television. TURNER reported that EASON was already in their bedroom taking a nap. TURNER further stated that on the evening of March 31, he observed M.E., EASON, and the decedent (G.F.), and they all appeared to be in good health.

35. TURNER told MPD that in the early morning hours of Wednesday April 1, 2020, he left the home to get

TECHNICAL Warrants CLERK
PENDING ISSUE A WARRANT JORN

TO: Jeannine Eason

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF OCTOBER 2020

JUDGE, DEPUTY CLERK, SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revise Date: 09-20
Superior Court of the District of Columbia

CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

Defendant's Name: Ta'Jeanna Lason

Sex: Female
Race: Black
DOB: 8/09/1980
Hair: Brown
Eye: Black
Complexion: Med
SCARS, MARKS, TATTOOS: Unknown

Defendant's Home Address: 953 Division Ave NE, #5 Washington, DC 20019

Complainant's Name: G.E.

Location of Offense: 953 Division Ave NE, #5 Washington, DC 20019

Date of Offense: April 1, 2020

Time of Offense: 8:25 Hour

Caution and Medical Conditions (CMC): Select a valid CMC code based on the victim's condition.

- 00 - Harmful Drug
- 01 - Escape Risk
- 02 - Violent Offender
- 03 - Sexually Violent Predator
- 04 - No Escape Risk
- 05 - No Mental Illness
- 06 - No Medical Condition
- 07 - Kicked in the Head
- 08 - Yes
- 09 - No

Give a Brief Description of What Happened:

work said that later in the morning, he received a call from LASON saying that G.E. was unconscious and that the police were at the house.

36. During the interview, TURNER admitted to Detectives that he physically disciplined the children - M.E. the most but added that was how he was raised. TURNER stated it was his belief that if a child misbehaved, then they should be dealt with accordingly. Detectives inquired about the incident in January 2020 where the decedent sustained a severe laceration to his head while under his care. TURNER reported that the injury was caused by the decedent falling off a bed. TURNER stated that he phoned LASON to report the injury. TURNER said that during this incident, he also punched M.E. for allowing his younger siblings to do what they want. TURNER told the Detectives that he handled M.E. "as an adult" when explaining how he disciplined him during this incident.

37. TURNER spoke with Detectives about another instance where the decedent sustained an "unexplained" eye injury (black eye). TURNER stated that when he asked M.E. about the injury, his explanation wasn't sufficient, so TURNER punched M.E. in the face to teach him a lesson.

38. TURNER told the Detectives that in another instance, he punched M.E. in the arm and chest to demonstrate to M.E. how it feels to hit someone. TURNER said that he beat up M.E. one time, giving him a "teenager whooping." TURNER said he "went to his body, like my father did me" to describe that particular incident.

Affiant's Signature: 

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Lason

Charges: First Degree Murder

Assistant United States Attorney

Subscribed and Sworn Before Me this 22nd Day of October 2020

(Judge Deputy Clerk) Superior Court of the District of Columbia

Revision Date: 11-20-06.
### Superior Court of the District of Columbia
### CRIMINAL DIVISION

#### AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
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<tr>
<th>DEFENDANT’S NAME</th>
<th>Nickname</th>
<th>Alias(es)</th>
<th>CON:</th>
<th>PDID</th>
</tr>
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<tr>
<td>Lc. Jeanine Eason</td>
<td></td>
<td></td>
<td>20-053489</td>
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|-------------|-------------|----------------|---------|---------|-----------|-----------|----------|-------------------------------|

<table>
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<tr>
<th>LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, DC 20019</th>
<th>TELEPHONE NUMBER: (202) 549-1668</th>
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<tr>
<th>COMPLAINANT’S NAME: G.E.</th>
<th>DATE OF OFFENSE: April 1, 2020</th>
<th>TIME OF OFFENSE: 1:25 hours</th>
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</thead>
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#### CAUTION AND MEDICAL CONDITIONS (CMC)

Select the valid CMG code below for wanted person when using the caution indicator.

- 00 = Armed and Dangerous
- 01 = Violent Felon
- 02 = Missing Person
- 03 = Intoxicated
- 04 = Emotional Disturbance
- 05 = Impairment

#### GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

TURNER reported that he subsequently had a conversation with EASON where she asked him not to discipline her kids because he hit them too much. TURNER said, however, that he was more “lenient” on the kids than was his wife. TURNER stated that EASON “don’t play” and that she would “pull the kids up by the shirt and pop them with a belt.” [NOTE: There were broken marks on her lower extremities consistent with being hit with a belt]

39. During the later interview on April 1, 2020, conducted by your affiant and Detective Del-low, TURNER reiterated many of the same facts he told to Detectives Howard and Taylor. TURNER additionally stated that in the twenty-four hours preceding the decedent’s death, he was the only caretaker for the children. TURNER said that EASON was physically unable to discipline the children because of her current physical condition (pregnancy). TURNER stated that G.E.’s mother had hit G.E. yesterday and the week before. During this interview, your affiant asked TURNER’s cellular telephone number and prior to concluding the interview, received written consent from TURNER to forensically examine and process his cellular telephone for evidence.

#### INTERVIEWS OF WITNESSES:

40. On scene, N.C. spoke to Officer Fogles and stated: “I didn’t do anything, everyone was sleeping. Nothing happened, I don’t know what happened.”

### AFFIANT’S SIGNATURE:

Anthony D. Greens

### TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Jeanine Eason

[Signature]

[Name]

ASSISTANT UNITED STATES ATTORNEY

[Signature]

[Name]

[Signature]

Subscribed and Sworn Before Me this 22nd Day of October 2020

[Signature]

[Name]

JUDICIAL DEPUTY CLERK, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

[Signature]

[Name]
Exhibit C p. 019

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVITT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Tezonna EASON


HEIGHT: 5'7  WEIGHT: 170  EYES: Brown  HAIR: Black

COMPL: N/A  SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS: 1125 925 Division Ave NE, #6 Washington, DC 20002

COMPLAINT'S NAME: G.I.

LOCATION OF OFFENSE: 925 Division Ave NE, #6 Washington, D.C. 20002

DATE OF OFFENSE: April 1, 2020  TIME OF OFFENSE: 8:23 AM

CRIMINAL AND MUSICAL CONDITIONS (CMC)
Select a valid CMC code before for waiver person when using the excelle indicator.

<table>
<thead>
<tr>
<th>CMC Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>00</td>
<td>Armed and Dangerous</td>
</tr>
<tr>
<td>05</td>
<td>Violent Tendency</td>
</tr>
<tr>
<td>10</td>
<td>Mental Instability</td>
</tr>
<tr>
<td>15</td>
<td>Explosive Behavior</td>
</tr>
<tr>
<td>25</td>
<td>Escape Risk</td>
</tr>
<tr>
<td>30</td>
<td>Sexually Violent Predator</td>
</tr>
<tr>
<td>35</td>
<td>Alcohol</td>
</tr>
<tr>
<td>40</td>
<td>Other (Specify)</td>
</tr>
<tr>
<td>41</td>
<td>Other (Specify)</td>
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<td>Other (Specify)</td>
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<td>43</td>
<td>Other (Specify)</td>
</tr>
<tr>
<td>44</td>
<td>Other (Specify)</td>
</tr>
</tbody>
</table>

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

41. While at the hospital, M.E. disclosed to the doctors that he was beaten by TURNER. (See above paragraph 19.)

42. On April 1, 2020, prior to M.E.'s medical examinations and before he told the medical staff about the physical abuse, he was interviewed by Detectives Howard and Taylor. The interview was conducted with EASON's knowledge and consent. When the Detectives first met M.E., he had a black eye. Prior to the interview, while in a police vehicle on route to MPD's Sixth District Station, M.E. stated to Detective Howard that he knew his mother was going to blame him and that "CPS" was going to take him away.

43. M.E. told the Detectives that on March 31, 2020, his mother had a doctor's appointment in the morning and that when she woke up, TURNER was already gone. M.E. said that later in the afternoon, his mother and step-father returned home with pizza. M.E. said that TURNER told him to feed his siblings, so he warmed up the pizza and gave the pizza to his brothers. M.E. reported that later in the evening, he put on a movie and his brothers fell asleep. M.E. stated that he stayed on the sofa in the living room and that his brothers slept in the bedroom.

44. M.E. told the Detectives that the next morning, his mother went to his brothers' bedroom to check on L.E. and G.E. M.E. said his mother observed a bruise on L.E.'s face and asked L.E. what happened, but L.E. did not answer. M.E. reported that G.E. appeared to be asleep. His mother said G.E. looked sad and asked him (M.E.) to

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

TEZONNA EASON

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October 2020

GUARDIAN DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Form CPI-9, 2-19

Revised Date: 11-29-05
pick him up. M.E. said that after he picked up G.E., his mother realized he was limp and lifeless and started to scream. M.E. said his mother then called 911.

45. M.E. was later asked during the interview if he was ever disciplined by TURNER. M.E. responded yes. Detectives asked M.E. to talk about how he got a black eye, but M.E. said he did not want to talk about it.

46. On April 6, 2020, a forensic interview of M.E. was conducted at the Children’s Advocacy Center in Virginia.

During that interview, M.E. reported the following:
- He felt safe at the home of his new foster parent.
- When asked if he felt safe at his home (935 Division Avenue NE, Apartment 6) with his mother and stepfather Antonio [TURNER], he said no and said it felt like a “death trap.”
- He usually gets blamed for injuries to his younger siblings because he’s usually with them.
- His mother didn’t realize that “the marks and bruising ramp up” when Antonio [TURNER] came around.
- Antonio [TURNER] would beat G.E. and L.E. when his mother was either not around or not in position to hear the abuse.
- Once his mother observed the injuries to his siblings, she would blame M.E. for their injuries.
- The last assault on G.E. and L.E. took place a few days prior to when his mother [FASON] and Antonio

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Tu'Jeanna Rason

ASSISTANT UNITED STATES ATTORNEY

22nd October 2020

(JUDGE DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Dates 11-29-06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

O.K.

LOCATION OF OFFENSE:

difficult and hazardous conditions.

Select a service or crime below for warrant purpose when using the service includee.

19 Assault and Battery
20 Robbery
21 Burglary
22 Disorderly Conduct
23 Criminal Destruction
24 Criminal Trespass
25 Assault
26 Sexual Assault
27 Rape or Sexual Assault
28 Kidnapping
29 Child Abuse
30 Child Exploitation
31 Child Torture
32 Child Neglect
33 Child Molestation
34 Child Exploitation
35 Child Neglect
36 Child Molestation
37 Child Exploitation
38 Child Neglect
39 Child Molestation
40 Child Exploitation
41 Child Neglect
42 Child Molestation
43 Child Exploitation
44 Child Neglect
45 Child Molestation
46 Child Exploitation
47 Child Neglect
48 Child Molestation
49 Child Exploitation
50 Child Neglect
51 Child Molestation
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87 Child Molestation
88 Child Exploitation
89 Child Neglect
90 Child Molestation
91 Child Exploitation
92 Child Neglect
93 Child Molestation
94 Child Exploitation
95 Child Neglect
96 Child Molestation
97 Child Exploitation
98 Child Neglect
99 Child Molestation
100 Child Exploitation

DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
12:25 hours

ON A BRIEF DESCRIPTION OF WHAT HAPPENED:

[M. J.] was in [his] Doctor's appointment on the morning of March 1, 2020, leaving [him] home alone. During that assault, M.E. reported he heard snoring and his brother started to cry before Antonio [TURNER] told them to "SHUT UP, SHUT UP!"

- He looked up a video on YouTube that persuaded [him] and [his] parents to keep [him] out of the room.
- He believed that his step-father Antonio [T. R.N.R] would stop abusing [his] brother when [they] were able to mail and attend them.
- The day after the last assault, [he] observed marks on [his] neck, which [his] mother immediately blamed M.E. for injuring.
- M.E. reported historical beatings of [his] brother, using the palms of [his] hands, [his] feet, and a bat.
- [His] step-father was aggressive to [his] and [his] children.

47. M.E. denied hitting G.R. or L.R., except for having [them] to keep [him] away from [their] mother's husband, which [he] had been instructed to do so that [she] could rest. Initially, M.E. stated that Antonio [TURNER] only

AFFIDANT'S SIGNATURE:

x Anthony D. Jones

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Theodore Ebens

Assistant United States Attorney

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October 2020

[Judge's Signature]
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

[Judge's Signature]
[Judicial Notary]
[Judicial Notary]
[Judicial Notary]
[Judicial Notary]
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Ta'Jeanna Fason
NICKNAME:
ALIAS(S):
CON:
20453489
PDID:

SEX: Female
RACE: Black
DOB: 8/19/1989
HEIGHT: 5'10"
WEIGHT: 150 lbs
EYES: Brown
HAIR: Black
COMPL.
Med
STRENGTH:
Unknown
SCARS, MARKS, TATTOOS:

DEFENDANT'S HOME ADDRESS:
LCA VS Division Ave NE, 612 Washington, DC 20019

COMPLAINT'S NAME:

LOCATION OF OFFENSE:
935 Division Ave NE, 612 Washington, D.C. 20019

DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
3:25 AM

CAUTION AND MEDICAL CONDITIONS (CMC):
Select a valid CMC code below for weapon possession when using the caution indicator.

00 = Armed and Dangerous
01 = Escaped Prisoner
02 = Sex Offender
03 = Violent Tendences
04 = Sexually Violent Predator
10 = Mental Health Patient
11 = Hair Condition
12 = Emotional Disability
40 = Medication Required
41 = Alzheimer's
42 = Known to abusers
43 = Expulsive Discharge
45 = Explosive Device
46 = Explosive Device

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

disciplined him if he did not listen to his mother - which was a rare occasion. He stated that the last time he was disciplined was right after they were sent home from school. He said Antonio [TURNER] struck his hand because they were playing a game and Antonio [TURNER] was trying to get to the controller first.

INJURIES AND CONDITION OF L.E.

48. On April 7, 2020, your affiant and Detective Howard conducted a follow-up telephone conference call with CNMC Doctor Adrienne Artis, who is an expert in child abuse and has been qualified as such in the District of Columbia, Maryland, and Georgia. Dr. Artis examined and treated L.E. on April 1, 2020, and prepared a Child and Adolescent Protection Center (CAPC) consult report with the following medical findings:

- L.E. suffered several different injuries, including fractured ribs and a lacerated liver.
- There is evidence of old and new rib fractures, with the older healing rib fractures occurring at least two weeks prior to L.E.'s presentation to the hospital on April 1, 2020.
- Observed bleeding in the hemopneumothorax in space and air around the lungs, and abdominal cavity, which most likely came from the liver. It is Dr. Artis' opinion that the amount of force to injure the liver would be

AFFIANT'S SIGNATURE:

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jeanna Fason

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October, 2020

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Talley Eason
NICKNAME: 
ALIASES: 
CON: 20-D33489
PDID:
SEX: FEMALE
RACE: BLACK
DOB: 8/19/1969
HEIGHT: 5'10"
WEIGHT: 165 lbs
EYES: BROWN
HAIR: BLACK
COMPL: 
SCARS, MARKS, TATTOOS: 
DEFENDANT'S HOME ADDRESS: 1443 Division Ave NE, #6, Washington, DC 20019
TELEPHONE NUMBER: (202) 911-4408

COMPLAINANT'S NAME: 
TELEPHONE NUMBER: 
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019
DATE OF OFFENSE: April 1, 2020
HOUR OF OFFENSE: 8:25 a.m.

CAUTION AND MEDICAL CONDITIONS (CMC): 
Select a valid CMC code below for wanted person where using caution indicator:
50 = Intoxicated and Dangerous
-05 = Intoxication
-20 = Sexually Violent Predator
10 = Mental Health Expert
-13 = Explosive Vice
-05 = Alcoholic
-65 = Uplift
-90 = Diabetic
-70 = Suicide
-99 = Other

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

extremely painful and cause the child to exhibit signs of discomfort when doing normal activities like running, playing, and eating. Based on the laboratory results, these injuries would have occurred at least twelve hours or more before arriving at the hospital. I.E. arrived at the hospital on April 1, 2020 at 5:25 p.m.

- The liver lacerations likely would have occurred within one or two days of I.E.'s presentation at the hospital on April 1, 2020. The time frame was based on I.E.'s high liver enzymes. There were three to four individual lacerations to I.E.'s liver.

- The liver lacerations were caused by BLUNT FORCE TRAUMA, coupled with the other injuries previously mentioned, shows a pattern of abuse to I.E. Dr. Ashby opined that the injuries would be consistent with sustaining injury after being involved in a multiple vehicle accident or falling from a twenty story building. Neither parent reported to any medical staff that I.E. had been involved in an accident.

- In Dr. Ashby's opinion, an eleven year old child weighing approximately 20 pounds could not have been able to cause the extensive injuries seen on either I.E. or even the deceased, G.E., who had similar injuries. Liver and kidneys are internal organs, which take a tremendous amount of force to physically damage.

APPLICANT SIGNATURE: 

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Talley Eason

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October 20

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

REVISION DATE: 10/25/06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME:
Le'Jeanne Rason

NICKNAME:

ALIAS:

CCN:
20-053489

PID:

SEX:
Female

RACE:
Black

DATE OF BIRTH:
8/19/1989

HEIGHT:
Unk

WEIGHT:
Unk

HAIR:
Brown

EYES:
Black

COMPL:
Med

SCARS:
Unknown

MARKS:

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
8:25 a.m.

LOCATION OF OFFENSE:
935 Division Ave NE, #6 Washington, DC 20019

CAUSAL AND MEDICAL CONDITIONS:
Select a valid CMC code below for wanted person's health using the caution indicator.

01 = Mental Disorder
25 = Escape Risk
02 = Violent Tendencies
26 = Sexually Violent Predator
10 = Marital Abuse
30 = Harassment
15 = Explosive Personality
33 = Alcohol (alcoholic)

NOTE: On June 5, 2020, in a follow-up consultation with Dr. Arisa, she stated that I.E. should have been or would have been in extreme discomfort, and exhibited signs of discomfort as a result of the injuries he sustained. He would not have been able to walk normally, play on a tablet, or eat.

Dr. Arisa observed bruising behind I.E.'s ears and scalp, dark blue purple around the right eye, and scars to his head. There were red linear patterns on the back, which could be consistent with being hit with a belt, and linear marks on the chest, which also could be consistent with being hit with a belt.

I.E.'s injuries would have been immediately present and visible to I.E.’s caretaker. I.E.'s injuries were so obvious that a caretaker, especially a parent, would have known or should have known that I.E. required immediate medical attention.

I.E. did not require surgery to treat his injuries, but, as a result of the severity of his injuries, he could have had complications which caused him to die.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Rason

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October, 2020

(ADDRESS)

ASSISTANT UNITED STATES ATTORNEY

NOT APPROVED

JPM

Revision Date: 11-29-66

AFFIANT'S SIGNATURE:

Anthony D. Greene

USW NO.:
Exhibit C p. 025

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: To Junior EASON
FN: Female
DOR: 8/8/1989
HGT: 6’6
WGT: 250
EYES: Brown
HAIR: Brown
COMPL: Med
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT’S HOME ADDRESS:
1312 31st St NW, Apt 4, Washington, DC 20010

TELEPHONE NUMBER:
(202) 491-5699

COMPLAINANT’S NAME:
G.L.

LOCATION OF OFFENSE:
953 Division Ave NE, #6, Washington, DC 20019

DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
8:25 hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for related person when using the caution indicator.
30 = Armed and Dangerous
35 = Escape Risk
01 = Violent Tendencies
20 = Sexually Violent Predator
10 = Martial Arts Expert
50 = Heart Condition
15 = Explosive Expertise
55 = Addict
65 = Epilepsy
01 = Other (Explain)
70 = Sicard
50 = Diabetic
50 = Medication Required
50 = Allergies
50 = Hemophilia
20 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

ADDITIONAL MPD INVESTIGATION

40. During the course of this investigation, your affiant learned that M.E. attempted to have his foster parent change his cellular telephone device following his placement with the foster parent on April 1, 2020. The foster parent was directed to retrieve the cellular device used and it could be obtained by MPD.

50. On April 6, 2020, MPD Detective Jerry Alston met with M.E.’s foster parent, who turned over M.E.’s black LG cellular device that has a registered telephone number of 202-677-1477, with model number LHD-Q710MM. Detective Alston then gave the aforementioned cellular device to your affiant, pending the issuance of a D.C. Superior Court search warrant to download its contents for evidence in this investigation.

51. Rich TURNER (see above statement to MPD) and EASON (see below statement of W 2 of a conversation with EASON) claimed that one of G.E.’s prior injuries occurred when he fell off a bed. Your affiant reviewed the crime scene photographs from the scene and observed that in the bedroom utilized by G.E. and I.E., there were two twin beds with a sleeping bag on each of the beds.

52. Additionally, during the course of the investigation, your affiant sought the assistance of MPD Detective Robert White, who conducted an examination of the cellular telephone belonging to TURNER. The examination

AFFIANT’S SIGNATURE:

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

{Signature}

{Affiant’s Name}

Subscribed and sworn before me this
22nd October 2020

{Signature}

Deputy Clerk

{District of Columbia}

AS ASSISTANT UNITED STATES ATTORNEY

{Signature}

{Date}

{District of Columbia}
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Ta'Jeanna Eason
SINCE: Black
DOB: 8/19/1989
HEIGHT: Unknown
WEIGHT: Unknown
EYES: Brown
HAIR: Black
COMPLAINT: Unknown
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
1401 3rd St. NW, Washington, DC 20001

TTL PHONE NUMBER:
(202) 491-1608

COMPLAINANT'S NAME:

LOCATION OF OFFENSE:
915 Division Ave NE, 46 Washington, D.C. 20019

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
1:23 P.M.

GAIT AND NEURAL CONDITIONS (CMC)
Select a valid CMC code below for a stated person when using the caution indicator.

20 = Agitated and Dangerous
25 = Escape Risk
50 = Sanction
60 = Other (Specify)
10 = Mental Health
50 = Other
20 = Known to abuse drugs
30 = Expulsive Drug
30 = Alcohol

GIVE A MORE DESCRIPTION OF WHAT HAPPENED:

revealed several text messages contained in the phone to a contact named "My Gumball" and listed to telephone number 202-491-1608. This phone number is EASON's.

TIMELINE OF ADDITIONAL EVENTS:
PRIOR INVESTIGATIONS, SUMMARY OF INCIDENTS, AND DAYCARE CENTER

53. On September 14, 2018, EASON registered E to attend an early childhood development center (ECD) in Washington, D.C. In the admissions records for ECD, EASON stated that she handled most of the discipline. Both E and I attended ECD.

54. A teacher at ECD, hereinafter referred to as W, explained that at the beginning of each day, if a teacher saw a mark upon a child during check-in for ECD, then the mother/caregiver was supposed to write a note explaining how the child received an injury. During the day, if a teacher saw a mark, the teacher was supposed to write a report and inform the parent.

55. On May 22, 2019, at about the same time that EASON began during TURNER, W observed E with a black eye. When asked by the ECD about it, EASON stated that E and his brother got into a fight and the brother hit him in the eyes.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason
Charged with: First-Degree Murder;
Forfeiture Petition (Crimes to Children)

ASSISTANT UNITED STATES ATTORNEY

22nd Day of October, 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

SUBSCRIBED AND SWORN BEFORE ME THIS ________

(Revised Date: 11/09/05)
Exhibit C p. 027

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
<thead>
<tr>
<th>DEFENDANT'S NAME:</th>
<th>Ta'Jeanna EASON</th>
<th>USW NO.:</th>
</tr>
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<tbody>
<tr>
<td>SEX</td>
<td>Female</td>
<td></td>
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<tr>
<td>RACE</td>
<td>Black</td>
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<tr>
<td>DOB</td>
<td>8/19/1989</td>
<td></td>
</tr>
<tr>
<td>HEIGHT</td>
<td>5'7&quot;</td>
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<tr>
<td>WEIGHT</td>
<td>120 lbs.</td>
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<tr>
<td>EYES</td>
<td>Brown</td>
<td></td>
</tr>
<tr>
<td>HAIR</td>
<td>Black</td>
<td></td>
</tr>
<tr>
<td>COMPLAINT'S NAME:</td>
<td>G.E.</td>
<td></td>
</tr>
<tr>
<td>LOCATION OF OFFENSE:</td>
<td>935 Division Ave NE, #6</td>
<td></td>
</tr>
<tr>
<td>D.O.B.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>DATE OF OFFENSE:</td>
<td>April 1, 2020</td>
<td></td>
</tr>
<tr>
<td>TIME OF OFFENSE:</td>
<td>3:25 pm</td>
<td></td>
</tr>
</tbody>
</table>

CAUTION AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for named person when using the caution indicator.

- 00 = Assault and Aggravated
- 05 = Violent Tendecies
- 10 = Mental Health
- 15 = Impairment
- 20 = Other
- 50 = Security Violent Predator
- 70 = Alcohol
- 80 = Medication Required
- 90 = Allergies
- 100 = Toxicology
- 110 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

56. On June 14, 2019, W-1 noticed marks on G.E.’s back but was not sure what they were. W-1 informed the director of ECDC, hereinafter referred to as W-2. EASON was called and claimed that she did not know what caused the marks. EASON stated she would take G.E. to the doctors. At this time, it is not known if EASON took G.E. for medical treatment.

57. On August 20, 2019, the decedent attended the ECDC and was observed to have unexplained trauma to his eye (black eye). Specifically, W-2 reported that on that day, EASON brought G.E. to the ECDC with an unexplained black eye. W-2 told EASON to take G.E. to a doctor. W-2 reported that when IT questioned EASON about the injury to G.E., EASON produced documents from a doctor medically clearing the decedent to return to school. W-2 stated that this incident was not reported to CPSA because of EASON’s rationale for the injury and the medical clearance. When questioned about the trauma to G.E.’s eye, EASON told the ECDC that G.E. fell in the closet and hit his eye on a toy. [NOTE: See below for comparison with the hospital records, indicating that EASON told the hospital that she thought his eye injury was a bug bite or allergies.]

58. According to medical records obtained from Prince George’s Hospital relating to G.E. and care provided on August 30, 2019, when asked how the cause of G.E.’s eye swelling, EASON responded that something might have hit him. The medical staff diagnosed him with a black eye (left periorbital ecchymosis - also described as raccoon eyes) and some eye abrasions. The medical record notes further describe:

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jeanna Eason

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF OCTOBER, 2020.

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Affiant's Signature: Anthony D. Green
Exhibit C p. 028

Superior Court of the District of Columbia

CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.: 20-053489

DEFENDANT’S NAME: Ta'Jeanna EASON

SEX: Female  RACE: Black  DOB: 01/19/1989

HIGH: 5’7”  WTG: 125 lbs  EYES: Brown  HAIR: Black

COMPL: Black  SCARS, MARKS, TATTOOS: Unknown

DEFENDANT’S HOME ADDRESS: 1800 13th St. NW, Washington, DC 20009

COMPLAINT’S NAME: G.E.

LOCATION OF OFFENSE: 933 Diviver Ave NE, 56 Washington, D.C. 20019

DATE OF OFFENSE: April 1, 2020  TIME OF OFFENSE: 8:23 AM

CAUTION AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for a wanted person when using the caution indicator.

- 00 = Assault and Battery
- 05 = Violent Tendencies
- 10 = Mental Health
- 25 = Escape Risk
- 30 = Sexually Violent Predator
- 50 = Heart Condition
- 70 = Substance Addict
- 75 = Alcoholism

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

EASON claimed that on the previous evening, she was on her computer, while the “husband” whom she also refers to as her “husband” was watching the children in the other room with a 2-year-old (G.E.) and a 10-year-old (M.E.). EASON stated the doors were off the closet and the father stated he had to get the child out of the closet. G.E. fell asleep on the couch and woke up crying. Later she observed discoloration around the left eye. He was not observed to fall off the couch. She ran out when she heard G.E. cry, but did not see any injury. EASON stated she gave the child Benadryl because she thought maybe he was having an allergy. EASON further stated that in the past, her 2-year-old had a black eye from the knobs of the closets. EASON claims that she did not suspect child abuse by the father. EASON did not want a CT scan because she did not want to expose G.E. to radiation and have him sedated.

59. On October 7, 2019, ECDC staff observed that G.E. had bunioning on the sides of his face and ears. In a signed note to ECDC, EASON claimed the injuries came from G.E. playing too roughly with siblings and that she had a talk with the older brother about playing too roughly with G.E.

60. On October 9, 2019, ECDC staff observed G.E. with unexplained bruises on his ears. EASON could not explain how G.E. sustained the bruises. W.2 explained to EASON that they were reporting the matter to CPSA.

[NOTE: M.E. had similarly described bruises to the back of his ears on April 1, 2020.]

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

CHARGE(S): First Degree Murder (G.E. to 2nd Child)

ASSISTANT UNITED STATES ATTORNEY

AFFIDAVIT’S SIGNATURE: Anthony D. Green

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October 2020

JUDGE, DEPUTY CLERK, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Ta'Jenna Eason
SEX: Female
RACE: Black
DOB: 8/19/1989
HEIGHT: 5'6
WEIGHT: 110
HAIR: Brown
EYES: Brown
COMPLEXION: Med
SCARS, MARKS, TATTOOS: Unknown

COMPLAINANT'S NAME: G.E.

LOCATION OF OFFENSE: 925 U Street NW, #6 Washington, D.C. 20001
DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:25 AM

Select a valid CMC code below for wanted person when using the caution indicator.

- 00 = Armed and Dangerous
- 21 = Escape Risk
- 05 = Violent Tradescant
- 36 = Sexually Violent Predator
- 10 = Habitual Act Expert
- 36 = Habit Condition
- 15 = Explosive Expert
- 25 = Alcoholics

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

61. Beginning October 16, 2019, Investigator Jilane Blake from MPD's YPSD investigated the abuse allegations, interviewing staff at ECDC and the family. W-2 told Blake that she approached EASON about the bruises on G.E.'s ears. EASON could not explain how she sustained the bruises. W-2 stated that she told EASON that she would be calling CPSA for the injuries because it is ECDC policy. EASON understood why the notification was being made. W-2 stated that EASON is a very mild-mannered person that has never had any problems with the staff. W-2 stated that on a previous occasion, G.E. was observed with a black eye and that when EASON was asked about it, she stated that G.E. fell and hit his head on some toons in the closet. W-2 reported that EASON stated that the children in her household play roughly with one another on a daily basis, so the bruises probably came from playing in the house.

62. Subsequently, EASON told Investigator Blake that she did not have the slightest idea where G.E. got the bruises on his ears. According to EASON, the boys were playing football in the house the previous week. Eason stated that she was aware of the scratches that were visible on the side of G.E.'s face, but did not see any bruises on his face. EASON stated that G.E. never cried or complained of any pain to his ears. EASON claimed that although G.E. is the smallest child in the household, he liked to play rough. She added that G.E. liked to hit the other children (the 3-year-old and 10-year-old). EASON stated that she asked all the other children if anything happened while playing with G.E. and the kids stated that nothing happened. EASON reported that she does not use any type of physical discipline in the household. She explained that she typically calls at the kids when they are playing too rough.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jenna Eason

SUBSCRIBED AND SWEORN BEFORE ME THIS 22nd Day of October, 20

JUDICIAL DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

ANTHONY D. JONES
Assistant United States Attorney

[Signature]
and she threatens to “pluck” them but she never does. When the children in the household get in trouble, they are typically punished.

63. On October 17, 2019, EASON sent the following text message to TURNER:
   “The kids are up again. She said they are losing the game. She said there is no sign of them.”

64. On October 18, 2019, CFSA filed a report with MPD about the October 9, 2019 incident.

65. On October 24, 2019, EASON sent the following text to TURNER:
   “I agree that long talk with Edna leaves a parent better a jelly sandwich on the table doesn’t put pajamas on the kids.”

66. On October 31, 2019, TURNER sent the following text to EASON:
   “I am crying in sleep and your son is crying I think that’s real I see how and you and Ellen didn’t say anything about you right there.”

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Ta’Jeanna Eason

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October 2020

(Judicial Deputy Clerk)

DISTRICT COURT OF THE
DISTRICT OF COLUMBIA
Exhibit C p. 031

Supior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Ta'Leema Eason
ICKNAME: Eason
ALIAS(es):
CON: 20-053489

SEX: Female
RACE: Black
DOB: 8/19/1989
HEIGHT: Unknown
WEIGHT: Unknown
EYES: Brown
HAIR: Black
COMPL: Med.
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
LKA 253 Division Ave NE, #6 Washington, DC 20001

TELEPHONE NUMBER:
(202) 1-1688

COMPLAINANT'S NAME:

LOCATION OF OFFENSE:
935 Divison Ave NE, #6 Washington, D.C. 20001

DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
8:25 hours

CAUTION: NO MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the existing indicator.

- 01 = Assault and Aggravated
- 02 = Violent Tendencies
- 03 = Sexually Violent Predator
- 04 = Mental Health Condition
- 05 = Explosive Disposition
- 06 = Drug Addict
- 07 = Alcoholic
- 08 = Known to abuse drugs
- 09 = Other

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

[NOTE: Your affiant believes from the circumstances of this text message that EASON is referring to her son M.E.]

67. On November 9, 2019, as later discovered from a video obtained from M.E.'s cell phone, M.E. videotaped himself cleaning up the dining room area. The video shows him with both his brothers (I.E. and G.B.), who are in high chairs. M.E. is seen doing laundry and vacuuming. Loud music (w/ explicit lyrics) can be heard and TURNER is seen on the video at times. At one point, a female voice [apparently EASON] calls out for M.E. and he goes off camera into the other room. The audio picks up EASON yelling and there is a loud smash. M.E. scream's out in pain. A few seconds later, M.E. walks back into camera view - he is crying and throwing something on the floor, saying that he didn't do anything. About a minute later, EASON is beside M.E. and there are additional loud smashes. M.E. cries out in pain. EASON states "you know what (inaudible) fact, shut the fuck up. You know exactly what the fuck you said." EASON continues to yell. M.E. comes back into camera view, crying and holding his mouth. TURNER asks M.E. "do you know what happened?" M.E. said no and tried to explain why he got in trouble. M.E. continues to cry.

68. On December 17, 2019, EASON sent the following text message to TURNER:

"OMG 2 work. H.E. has red marks on his nose and check."
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Ta'Jeanna EASON

DEPARTMENT: 18c-219

SEX: Female

AGE: 219, 1989

HEIGHT: 5 ft 4 in

WEIGHT: 150 lbs

COLOR: Black


ADDRESS: 1100 23rd St. NW, Washington, DC 20037

PHONE NUMBER: (202) 443-668

DEFENDANT'S MARKS: TATTOOS

DATE OF OFFENSE: April 1, 2020

TIME OF OFFENSE: 3:25 PM

LOCATION OF OFFENSE: 901 23rd St. NW, Washington, DC 20037

CHARGES: Violent Felony, Robbery

TIME A BRIEF DESCRIPTION OF WHAT HAPPENED:

TURNER responded:

"I don't know about the marks I only know about the chest because I seen weight but I told him put it down [M.E.] was right there before I left out and said [M.E.] pls get the weight we was working a lil I had full control over all of the kids in the house see nothing happened to G.E."

EASON responded:

"I'm just telling u what I saw on him. It's very subtle."

TURNER responded:

"Ok, you right."

69. On December 19, 2019, MPD interviewed 11 year old, M.E. who stated that he had played with his brother the night before the bruised ear incident, but did not see any injuries. He did not see how G.E.'s ears were injured. M.E. stated that G.E. and [I.E.] (this 3-year-old brother) always play rough in the house. Investigator Blake asked M.E. what happened in the house when they get in trouble, he stated that his mother sends them to their room. M.E. said his mother never uses physical discipline with them. M.E. stated that he felt safe at home with his family.

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

SUBSCRIBED AND SIGNED BEFORE ME THIS 22nd DAY OF October 20, 2020

Assistant United States Attorney

Revised Date: 12-10-20
Exhibit C p. 033

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Ta'lemo Yiason

NICKNAME: 

ALIASES: 

SEX: 

RACE: Black

DATE: 8/19/89

HEIGHT: Unknown

WEIGHT: Unknown

EYES: Brown

HAIR: Black

HEIGHT: Unknown

WEIGHT: Unknown

EYES: Brown

HAIR: Black

COMPL. NAME: 

SCARS, MARKS, TATTOOS: 

DATE OF OFFENSE: 

TIME OF OFFENSE: 

LOCATION OF OFFENSE: 

EXHIBIT A [A COLLECTION OF PHOTOGRAPHS] 

Exhibit A shows the scene of the incident and includes the following indicators:

- 01: Assault and Battery
- 02: Violent Tendons
- 03: Mental Instability
- 11: Explosive Language

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

70. Since G.E. was too small and non-verbal to interview, Investigator Blake determined there was not enough evidence to prove or disprove the allegation.

71. On January 16, 2020, MPD YPSD ruled the investigation as unfounded and it was closed in early March 2020.

72. On January 28, 2020, TURNER called 911 and G.E. was taken to CNMC with a severe laceration to G.E.'s forehead. TURNER claimed that G.E. fell off the bed. When later reviewing TURNER’s phone, your affiant observed a photograph of G.E. on a text thread between TURNER and EASON, dated January 20, 2020, from Children’s National Health System; the photo shows the defendant with a severe laceration to his forehead. At the time, EASON sent TURNER the following text:

“Sir we’re leaving these with [G.E.] again.”

TURNER responded:

“Yeah but it’s not his food he just not eating them like he used to.”

73. Subsequently, upon review of the CNMC medical records, on January 20, 2020, when TURNER called 911 and G.E. was taken to the hospital, the records indicate the following information from the examination and laboratory:

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF OCTOBER 2020

[Signature]

[Name]

DISTRICT JUDGE

DISTRICT COURT OF THE

DISTRICT OF COLUMBIA
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME:
Ta’Jeanna EASON

SEX: Female
RACE: Black
DOB: 8/9/1989
HEIGHT: 5’4”
WEIGHT: 130 lbs
EYES: Brown
HAIR: Black
COMPLIANCE: Unknown

DEFENDANT’S HOME ADDRESS:
LKA 915 Division Ave NE, #6 Washington, DC 20019

COMPLAINTANT’S NAME:
G.E.

LOCATION OF OFFENSE:
535 5th Street NW, #601 Washington, D.C. 20019

DATE OF OFFENSE: April 2, 2020
TIME OF OFFENSE: 8:25 p.m.

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person using the reaction indicator.

- 10 = Armed and Dangerous
- 21 = Escape Risk
- 46 = Sexual Predator
- 60 = Heart Condition
- 70 = Alcohol

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

interview of TURNER.

G.E. suffered a complex 7cm jagged laceration with concern for facial nerve laceration to his head and had a concussion. The records further indicated that TURNER said G.E. was taking a nap and asked the 11-year-old child [M.E.] to take care of the kids. He woke up to a thump and called out to his son, asking what happened. Child says that nothing happened. But then he had another bump in the room and went to bed yesterday. He saw his son holding G.E.’s head. Noticed that laceration and called 911. There was no reported loss of consciousness. He has been behaving normally since the incident. He has had no vomiting. There is no other trauma.

74. In February 2020, G.E. and I.E. did not attend their daycare center for most of the month. TURNER stated that it was difficult for his wife to get the children to daycare because she was pregnant and he couldn’t assist because he worked.

75. W-I reported that during early February 2020, it noticed that the decedent had not been attending the educational facility. W-I called EASON, inquiring about the status of the decedent. W-I reported that EASON said that the decedent had injured his head falling off a “bunk bed” and the doctor advised her that the decedent should not return to school until his injury had completely healed. [NOTE: The home did not have bunk beds.]

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta’Jeanna Eason

ASSISTANT UNITED STATES ATTORNEY

AFFIANT’S SIGNATURE:
X Anthony D. Greene

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd of October, 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.: 20-053489

DEFENDANT'S NAME: Ta'Jenna EASON
SEX: Female
RACE: Black
DATE: 8/19/1989
HEIGHT: 5’4
WEIGHT: 140 lbs
EYES: Brown
HAIR: Black
COMPLETENESS: Unknown
SCARS, MARKS, TATTOOS:

DEFENDANT'S HOME ADDRESS:
1030 Divison Ave NW, NW Washington, DC 20009

COMPLAINTANT'S NAME: G.E.

LOCATION OF OFFENSE:
923 Division Ave NE, NW Washington, DC 20009

DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE: 8:25 hours

CAUTION AND MEDICAL CONDITIONS (CMC):
Select a valid CMC code below for worsted person when using the caution indicator.
- 00 = Assault and Dangerous
- 05 = Violent Tendencies
- 10 = Marital Abuse
- 15 = Explosive Exposure

- 25 = Ecstasy Use
- 30 = Sexually Violent Predator
- 35 = Alcoholic

- 40 = Medication Required
- 45 = Temtophobia
- 50 = Hair Conditions

Give a brief description of what happened:

76. In March 2020, G.E. and I.E. did not attend their daycare center for the entire month. The school was closed for some portion of the month because of COVID.

77. On March 7, 2020, EASON sent the following text message to TURNER:

"Whatever u did to this boy don't do that shit again. His eye is swollen shut."

[NOTE: Your affiant believes this text message refers to TURNER hitting M.F. and causing his black eye.]

Timeline of March 31, 2020

78. Based on the above information, as well as additional information obtained during the MPD investigation, a timeline of March 31, 2020 is provided in Appendix A.

Calls on April 1, 2020

79. Subsequently, during the course of the investigation, your affiant learned that on April 1, 2020, between 6:08

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jenna Eason
Charge: 932
\textbf{JUDGE DEPUTY CLERK} SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

---

Affiant's Signature:

Rev 2/3/2009

---

Subscribed and sworn before me this 22nd Day of October, 2020

Judge

---

Revision Date: 11-29-06
Exhibit C p. 036

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

| DEFENDANT'S NAME | NICKNAME | ALIAS(S) | CCN | PED
|------------------|----------|----------|-----|-----
| Ta'Jeanna Eason  |           |          |     |     |

|--------|-------------|-----------------|--------|------------|------------|------------|---------------|---------------------|

<table>
<thead>
<tr>
<th>DEFENDANT'S HOME ADDRESS: 1029 12th St. N.W., #300 Washington, DC 20009</th>
<th>TELEPHONE NUMBER: (202) 341-3466</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>COMPLAINANT'S NAME: G.E.</th>
<th>TELEPHONE NUMBER:</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>LOCATION OF OFFENSE: 753 Division Ave NE, #6 Washington, D.C. 20001</th>
<th>DATE OF OFFENSE: April 1, 2016</th>
<th>TIME OF OFFENSE: 8:24 a.m.</th>
</tr>
</thead>
</table>

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for warning persons when using the caution indicator.
- 35 = Assault and Battery
- 30 = Sexually Violent Predator
- 10 = Mental Health
- 15 = Explosive Disorder
- 55 = AIDS/HIV
- 65 = Epilepsy
- 61 = Other Illness
- 60 = Diabetic
- 66 = Allergies
- 80 = Medications Required
- 70 = Substance Abuse
- 71 = Hepatitis B
- 72 = HIV/AIDS

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

80. As indicated above, EASON and TURNER left the home, leaving the children in the care of 11-year-old, M.E. Also, even when they were present, they frequently ordered the 11-year-old to tend to his two and three-year-old siblings. M.E. was ordered to cook, feed, and clean the house. M.E. was required to wake up in the middle of the night and change his sibling’s diapers so as not to wake up EASON or TURNER.

81. In summary, the above information evidences how defendants EASON and TURNER collectively and chronically inflicted injury upon the three children who lived with them, including two-year-old G.E., who died at their hands. Through their actions and inactions, in situations where they knew or should have known that the two-year-old decedent (G.E.), as well as three-year-old E.E., required immediate medical attention, yet they failed to call for medical assistance until G.E. was found dead on April 1, 2020. Throughout the past year, each of the three children were abused, eventually leading to G.E.’s death. In the last day of G.E.’s life, neither parent sought medical treatment for him or his injured brother, who suffered very similar and serious injuries which required medical treatment.

AFFIANT'S SIGNATURE: X Anthony B. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jeanna Eason

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October, 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Form CR(3)-435c - NCAP APPROVED - Revision Dates 1-29-08
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: Toju Emmanu Bason
NICKNAME: 
ALIASES: 
CON: 20-003189

SEX: Male
RACE: Black
DATE OF BIRTH: 12/21/1989
HEIGHT: 6’0”
WEIGHT: 190 lbs
EYES: Brown
HAIR: Black
COMPL. MEDICAL CONDITIONS: Unknown
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT’S HOME ADDRESS: EKA 351 Division Ave NE, #6 Washington, DC 20019

PHONE NUMBER: (202) 911-1608

COMPLAINANT’S NAME: 

LOCATION OF OFFENSE: 935 Division Ave NE, #5 Washington, DC 20019
DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 2:25 PM

CLAIMED AND MEDICAL CONDITIONS (CMC): 
Select a valid CMC code below for the patient when using the caution indicator.
...05 = Assault and Battery
...09 = Mental illness
...10 = Explosive Expert

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Attention. Based on the above, both defendants are being charged with First Degree Assault to Children and Felony Murder.

82. Based on the aforementioned facts and circumstances gathered through the course of this investigation, your Affiant submits that probable cause exists to believe that Antonio Dale TURNER (DOB: 05/23/1992, PHN: 606-380) committed the criminal offenses of First Degree Assault to Children and Felony Murder, in the District of Columbia, and request that warrants be issued for their arrest.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Toju Emmanu Bason
Charged with Assault to Children and Felony Murder

ASSISTANT UNITED STATES ATTORNEY

AFFIANT’S SIGNATURE:

Nancy D. Green

SUBSCRIBED AND SWORN BEFORE ME, October 22nd, 2020

(AND) SUPERINTENDENT OF THE DISTRICT OF COLUMBIA

Revision Date: 11/10/2020
## APPENDIX A

<table>
<thead>
<tr>
<th>March 31, 2020</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>7:15 a.m.</strong></td>
<td>EASON said they left the house at 7:15 a.m. because her pregnancy checkup appointment was at 8:00 a.m. EASON said she drove, but then corrected herself and said her husband drove; she also claimed a cousin came to pick her up.</td>
</tr>
<tr>
<td><strong>7:20-7:30 a.m.</strong></td>
<td>TURNER and EASON left apartment for ultrasound appointment.</td>
</tr>
<tr>
<td><strong>8:30-9:00 a.m.</strong></td>
<td>In TURNER’s first interview, he claimed they left for hospital at 8:30 – 9:00 a.m. Ultrasound appointment at GW hospital. They were told to stay longer because of a blood pressure issue with EASON and the possibility of EASON being admitted to induce her baby.</td>
</tr>
<tr>
<td><strong>10:00-11:00 a.m.</strong></td>
<td>TURNER or EASON received a call from a private number. TURNER or EASON called back but no response. This is a call from a computer, so they assume it is from one of the kids.</td>
</tr>
<tr>
<td><strong>11:00 a.m.</strong></td>
<td>EASON stated that while she was the hospital, TURNER left the hospital and went to the store, then home. EASON said she called TURNER while he was at the house and told him they were letting her go from the hospital. EASON claimed that after they left hospital, they went straight back home.</td>
</tr>
<tr>
<td><strong>12:30 p.m.</strong></td>
<td>TURNER claimed M.E.’s phone was not working, so TURNER went home; said he saw G.E. trying to get to his weight bar, so he “popped” G.E. on the hand and took him to a room. TURNER heard I.E. running around, then saw I.E. with a “boo-boo” on his head and he was fine. TURNER punched and kicked M.E.; asked him “what the F-” he was doing.</td>
</tr>
<tr>
<td><strong>12:30 p.m.</strong></td>
<td>Because of the prolonged monitoring at the hospital, TURNER left to pick up food at Walmart for the kids. He arrived at the apartment to deliver the food and pick up medication at 12:30 p.m. [NOTE: this differs from his first interview.]</td>
</tr>
<tr>
<td><strong>12:30 p.m.</strong></td>
<td>TURNER stated that he walked into apartment and saw kids playing with workout equipment and the apartment in disarray. He admitted he hit both M.E. and G.E.</td>
</tr>
</tbody>
</table>

| There is conflicting detail about a call/calls between EASON and TURNER during the apartment visit: |
| 1. TURNER stated he called EASON right when he walked into the apartment. |
| 2. TURNER stated EASON called to ask why he hadn’t yet returned to the hospital. EASON heard G.E. crying in the background and asked about it. EASON hung up because the doctor was with her. |
| 3. TURNER later stated that EASON called when TURNER was getting into his truck and heard him shut the car door. She wanted to know why he hadn’t yet returned to the hospital. |

| Around lunch time | M.E. said TURNER came home for three minutes. |

*Anthony D. Greene [Signature]*
<table>
<thead>
<tr>
<th>Time</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>12:40 p.m.</td>
<td>Turner left apartment within 7-10 minutes of arriving. He went back to hospital to pick up Eason and then both return to the apartment.</td>
</tr>
<tr>
<td></td>
<td>Eason stated she came home from her appointment at about 1:00 or 2:00. [NOTE - text messages do NOT corroborate this. She was still at GW hospital at 2:30 p.m.]</td>
</tr>
<tr>
<td>1:00 p.m.</td>
<td>Eason claimed her husband and oldest son, M.E., were at home babysitting G.E. and G.E. She claimed they left the kids at home because of Coronavirus.</td>
</tr>
<tr>
<td>1:00 or 2:00 p.m.</td>
<td>Eason said she called Turner and let him know they were discharging her from the hospital. Eason said that Turner picked her up shortly after 1:00 p.m. and they went directly back to the apartment between 1:00 and 2:00 p.m.</td>
</tr>
<tr>
<td>1:30 p.m.</td>
<td>M.E. said Dad came in, gave him the phone, and Mom asked (over the phone) where are the Tums? M.E. said they are on her dresser, he got them and gave them to Dad, and he left back out.</td>
</tr>
<tr>
<td>2:30 p.m.</td>
<td>Turner claimed that he and Eason arrived back from the hospital at 2:30 p.m. Turner confirmed the time they were away from the apartment was from 8:30 a.m. - 2:30 p.m.</td>
</tr>
<tr>
<td>2:56:40 p.m.</td>
<td>Text message from Turner to Eason stating &quot;I'm waiting for you&quot;</td>
</tr>
<tr>
<td>2:56:43 p.m.</td>
<td>Turner texted &quot;I'm outside&quot;</td>
</tr>
<tr>
<td></td>
<td>Turner stated they stopped at Walmart to get food.</td>
</tr>
<tr>
<td></td>
<td>Turner stated he went to Walmart on H Street.</td>
</tr>
<tr>
<td></td>
<td>According to Google Maps, it takes 26 minutes to drive from GW Hospital to 935 Division Avenue, Northeast.</td>
</tr>
<tr>
<td></td>
<td>M.E. stated that Turner came in to get Tums and he looked outside and saw Mom and Dad sitting in the car.</td>
</tr>
<tr>
<td></td>
<td>Eason admitted that when they got home, she stayed in the car to catch her breath. [NOTE: M.E. said that his mother stayed in the car when they came home.]</td>
</tr>
<tr>
<td></td>
<td>Once Eason and Turner arrived home, it does not appear they again left the apartment on March 31.</td>
</tr>
<tr>
<td>5:00 p.m.</td>
<td>Turner claimed he came home around 5:00 p.m. from wife's hospital visit to get his &quot;medicine&quot; or marijuana for his ADHD and got Eason some Tums.</td>
</tr>
<tr>
<td></td>
<td>Turner stated when they got home, the kids were fine.</td>
</tr>
<tr>
<td></td>
<td>Eason claimed she came in the house and went to sleep until 6:00 and that M.E. brought her chicken nuggets because she did not want pizza. She laid back down.</td>
</tr>
<tr>
<td></td>
<td>M.E. remembered Turner brought pizza home and then returning 30 to 45 minutes later.</td>
</tr>
<tr>
<td></td>
<td>Turner stated G.E. was up because he popped him.</td>
</tr>
<tr>
<td>3:30 - 6:00 p.m.</td>
<td>Turner stated G.E. was asleep when Turner and Eason arrived back and that G.E. woke up around 6:00 p.m.</td>
</tr>
<tr>
<td>6:00 - 7:00/7:30 p.m.</td>
<td>M.E. said he heated pizza in oven at 6:00 p.m. Turner told M.E. to wake up G.E. to eat at 7:00/7:30 p.m.</td>
</tr>
</tbody>
</table>

Signed: [Signature]
### APPENDIX A

<table>
<thead>
<tr>
<th>Time</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>7:00 p.m.</td>
<td>TURNER stated G.E. did not want to eat pizza, but did eat apple sauce. I.E. ate one slice of pizza.  7:00 p.m. TURNER laid down; told M.E. to feed pizza to boys; TURNER walked to children’s room and saw G.E. was on tablet. TURNER claimed that I.E. looked hurt and I.E. said nothing was wrong and then “hid fixed” TURNER. TURNER said he gave both G.E. and I.E. a tablet and he went to bed.</td>
</tr>
<tr>
<td>7:00 p.m.</td>
<td>EASON stated Dad fed G.E. pizza.  EASON said she came home and went to bed; checked on G.E. and I.E. at 10:30 p.m. and both children were on their tablets and watching TV and appeared fine. [NOTE: Dr. Artis, an expert in Child Abuse, stated that the injuries to the children would have been obvious and they would have been manifesting symptoms from the damaged liver and kidneys.]</td>
</tr>
<tr>
<td>7:00 p.m.</td>
<td>TURNER stated that at 7:00 p.m., he did not hear from the boys. He was in the bedroom laying down and his wife was sleeping. TURNER asked M.E. if he made pizza to give to the kids. M.E. said yes. TURNER said he checked in on G.E. and I.E. at around 7:30 p.m. or 8:00 p.m. and claimed they were in their bedrooms and doing fine. [NOTE: Dr. Artis stated that the child’s injuries would have been obvious and neither would have been acting or walking normally on the evening of March 31, 2020.]</td>
</tr>
<tr>
<td>7:00 p.m.</td>
<td>TURNER said he heard G.E. crying but he did not check on him because he knew he was okay.  around 7:30 p.m. M.E. said he made I.E. and G.E. pizza and they looked fine, Mom was asleep. G.E. and I.E. “looked normal.”  8:30 p.m. TURNER stated he fed the kids around 7:30 p.m. and checked on them, and claimed they were good. TURNER admitted using marijuana at the time. He heard G.E. crying for something but admitted he did not check on him.</td>
</tr>
<tr>
<td>5:00-9:30 p.m.</td>
<td>TURNER went to bed at 9:00 or 9:30 p.m.  10:00 p.m. EASON said she woke up at approximately 10:00 p.m. and her husband had fed the kids and they were playing, watching TV.</td>
</tr>
<tr>
<td>10:30 p.m.</td>
<td>TURNER claimed his wife got up and took over at 10:30 p.m., because he had to work the next day.  EASON stated that she got up and checked on the kids. The kids were still up, playing with the tablets and watching TV in their bedroom. M.E. was watching TV in the living room. EASON went back to bed and heard G.E. whining like his tablet died but EASON went to sleep. TURNER was in bed.</td>
</tr>
</tbody>
</table>

---

*Anthony D. Greene*  
*10/17/20*
## APPENDIX B

### Calls on April 1, 2020

<table>
<thead>
<tr>
<th>Time</th>
<th>To/From</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>06:08:57am</td>
<td>TURNER to EASON</td>
<td>01:57</td>
</tr>
<tr>
<td>06:11:42am</td>
<td>TURNER to EASON</td>
<td>00:10</td>
</tr>
<tr>
<td>06:42:28am</td>
<td>TURNER to EASON</td>
<td>15:47</td>
</tr>
<tr>
<td>07:16:25am</td>
<td>TURNER to EASON</td>
<td>00:22</td>
</tr>
<tr>
<td>07:51:49am</td>
<td>TURNER to EASON</td>
<td>Not answered</td>
</tr>
<tr>
<td>07:52:01am</td>
<td>EASON to TURNER</td>
<td>00:16</td>
</tr>
<tr>
<td>08:23:08am</td>
<td>EASON to TURNER</td>
<td>Not answered</td>
</tr>
<tr>
<td>08:23:18am</td>
<td>EASON to TURNER</td>
<td>Not answered</td>
</tr>
<tr>
<td>08:23:37am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
</tr>
<tr>
<td>08:23:43am</td>
<td>TURNER to EASON</td>
<td>00:04</td>
</tr>
<tr>
<td>08:23:50am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
</tr>
<tr>
<td>08:24:04am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
</tr>
<tr>
<td>08:24:11am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
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911 call made at 08:24:11am

<table>
<thead>
<tr>
<th>Time</th>
<th>To/From</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>08:26:07am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
</tr>
<tr>
<td>08:26:40am</td>
<td>TURNER to EASON</td>
<td>00:04</td>
</tr>
<tr>
<td>08:32:50am</td>
<td>EASON to TURNER</td>
<td>05:05</td>
</tr>
<tr>
<td>08:53:34am</td>
<td>EASON to TURNER</td>
<td>00:18</td>
</tr>
<tr>
<td>08:54:18am</td>
<td>TURNER to EASON</td>
<td>03:57</td>
</tr>
<tr>
<td>09:16:17am</td>
<td>EASON to TURNER</td>
<td>02:12</td>
</tr>
<tr>
<td>09:31:05am</td>
<td>EASON to TURNER</td>
<td>00:00</td>
</tr>
<tr>
<td>09:31:11am</td>
<td>TURNER to EASON</td>
<td>00:04</td>
</tr>
</tbody>
</table>

Anthony D. Greene

10/17/20
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
CRIMINAL DIVISION

COMPLAINT

District of Columbia ss:

Defendant's Name: Antonio Dale Turner

Also Known As: (First) (Middle) (Last)

Address: aka 935 Division Ave, NE Apt. 6, Washington DC

On or about April 1, 2020, within the District of Columbia, Antonio Dale Turner did torture, cruelly beat, abuse and otherwise willfully maltreat G.E., a child under the age of eighteen years, that is, about two years of age. (Cruelty To Children, in violation of 22 D.C. Code, Section 1101 (2001 ed.))

Antonio Dale Turner, within the District of Columbia, in perpetrating and attempting to perpetrate the crime of Cruelty to Children, killed G.E. by torturing, beating, abusing and neglecting him with his hands, neglect, and maltreatment on or about April 1, 2020, thereby causing injuries from which G.E. died on or about April 1, 2020. (First Degree Murder - Felony Murder, in violation of 22 D.C. Code, Section 2101 (2001 ed.))

Co-Defendants:

Subscribed and sworn to before me this 22nd day of October, 2020

WARRANT
Judge Jonathan H. Pittman

To The United States Marshal or any other authorized federal officer or the Chief of Police of the District of Columbia:

WHEREAS the foregoing complaint and affidavit supporting the allegations thereof have been submitted, and there appearing probable cause and reasonable grounds for the issuance of an arrest warrant for

YOU ARE THEREFORE COMMANDED TO BRING THE DEFENDANT BEFORE SAID COURT OR OTHER PERSON ENUMERATED IN 18 U.S.C. 3041 forthwith to answer said charge.

Issued October 22, 2020

Title 16: □ Rule 105: □ Judge:

Sex: Male DOB: 05/23/2020 CCN: 20053489 PDID: 606380

Papering Officer: Det. Anthony Greene Badge No.: D2-1515

OFFICER MUST EXECUTE RETURN

Officer's Name: Date / Time: October 17, 2020

AUSA Signature: 16/17/20
**Superior Court of the District of Columbia**

**CRIMINAL DIVISION**

**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**

<table>
<thead>
<tr>
<th>DEFENDANT'S NAME:</th>
<th>USW NO.:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Antonio Dale Turner</td>
<td>[Redacted]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Male</td>
<td>Black</td>
<td>02/19/1992</td>
<td>5'7</td>
<td>185</td>
<td>Brown</td>
<td>Black</td>
<td>Dark</td>
<td>Unknown</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DEFENDANT'S HOME ADDRESS:</th>
<th>TELEPHONE NUMBER:</th>
</tr>
</thead>
<tbody>
<tr>
<td>935 Division Ave NE, #6, Washington, DC, 20019</td>
<td>(202) 337-1663</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>COMPLAINANT'S NAME:</th>
<th>TELEPHONE NUMBER:</th>
</tr>
</thead>
<tbody>
<tr>
<td>[Redacted]</td>
<td>[Redacted]</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>LOCATION OF OFFENSE:</th>
<th>DATE OF OFFENSE:</th>
<th>TIME OF OFFENSE:</th>
</tr>
</thead>
<tbody>
<tr>
<td>935 Division Ave NE, #6, Washington, DC, 20019</td>
<td>April 1, 2020</td>
<td>8:00 hours</td>
</tr>
</tbody>
</table>

**CARTERS AND MEDICAL CONDITIONS (CMC)**

- [Redacted]

**GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:**

The evidence and information contained in this affidavit describes how defendants Ta'Jeanna EASON and Antonio TURNER collectively and chronically inflicted injury upon their three children, including two-year-old G.E., who died at their hands. Through their actions and inactions, in situations where they knew or should have known that the two-year-old child and his three-year-old brother, I.E., required immediate medical attention, they failed to properly care for the children and caused the injuries to G.E. that led to his death. Throughout the past year, each of the three children were abused, eventually leading to G.E.'s death. In the week prior to G.E.'s death, EASON and TURNER had exclusive care, custody, and control of the children and another parent reported any injuries or accidents to any of the children. Specifically, in the last days of G.E.'s life, EASON and TURNER failed to seek medical treatment or assistance for G.E. or his injured brother, I.E., only calling after G.E. was found dead on April 1, 2020. Based on all of the evidence, the defendants are being charged with First Degree Cruelty to Children and Felony Murder.

**EMERGENCY RESPONSE**

1. On Wednesday, April 1, 2020, at approximately 8:05 a.m., members of the Sixth District, Metropolitan Police Department (MPD), were dispatched to 935 Division Avenue, Northeast, Washington, D.C., Apartment 6, to investigate the report of an unconscious person. Once on the scene, the officers discovered D.C. Fire and Emergency Medical Services (EMS) personnel conducting life-saving efforts on an unconscious child. When EMS personnel arrived, the child was pronounced dead. The medical examiner determined the cause of death to be asphyxiation due to strangulation and asphyxia due to asphyxiation. The manner of death was ruled to be murder.

**AFFIANT'S SIGNATURE:**

X Anthony D. Greene

**TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

**ASSISTANT UNITED STATES ATTORNEY**

[Redacted]

22nd October 2020

[Redacted]

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-09-06
Affidavit in Support of an Arrest Warrant

Defendant's Name: Antonio Dale Turner
Sex: Male
Race: Black
DOB: 5/22/1992
Height: 5'7
Weight: 182 lbs
Hair: Unknown
Eyes: Brown
Aliases: None
CCN: 20-051-488
PDID: 600180

Complainant's Name: G.E.
Location of Offense: 931 Division Ave NE, Washington, D.C. 20019
Date of Offense: April 1, 2020
Time of Offense: 2:25 am

Cautions and Medical Conditions (CMC)
- 01 Assault and Aggravated Assault
- 02 Violent Felonies
- 03 Serious Felonies
- 10 Violent Felonies
- 11 Assault
- 30 Sexual Assault
- 12 Medical Conditions
- 13 Medications Required
- 14 Alcoholic
- 20 Hemophiliac
- 21 Peacemaker

A brief description of what happened:

arrived on the scene, they noted that the unconscious child's extremities were cold. There was visible signs of trauma, and no dependent levy or rigor mortis. After all life-saving measures failed, the decedent was pronounced dead on the scene at 8:43 a.m. The decedent's remains were subsequently transported from the scene to the D.C. Office of the Chief Medical Examiner (OCME), where an autopsy was performed to determine the cause and manner of death.

2. The decedent has been identified as G.E., with a date of birth of December 12, 2017.

3. The child's mother, Tamanna EASON, DOB: 08/19/1989, told first responders that she last saw the child between 10:00 p.m. and 11:00 p.m. (the previous night) and stated that her husband left for work at 5:30 a.m.

4. As a result of this investigation, members of MPD's Special Victims Unit were requested to respond and assume investigative responsibilities. Your affiant interviewed responding Officer K. Fogle, who reported that upon entering the residence, D.C. Fire/EMS personnel were actively engaged in life-saving measures. Also present in the home were the decedent's biological mother (EASON), her eleven-year-old son N.E., and her three-year-old son J.E. Officer Fogle reported that while on scene, EASON stated words to the effect of "YOU KILLED YOUR BROTHER" in the direction of her eleven-year-old son N.E.

Affiant's Signature:  

x Anthony D. Greene

To: Warrant Clerk
Please Issue a Warrant for:
Antonio Dale Turner

Charges: First-Degree Murder-Felony Murder (Criminal Homicide)

Assistant United States Attorney

22nd October 2020

SUBSCRIBED AND SWORN BEFORE ME THIS DAY BY

Signature of (Judge) Deputy Clerk Superior Court of the District of Columbia

Revision Date: 11-29-06
Exhibit D p. 004

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Date TURNER

RACE: Male
DOB: 5/23/1992
HEIGHT: 5'7
WEIGHT: 183

DEFENDANT'S HOME ADDRESS:
1234 Divani Ave NE, 46 Washington, DC 20010

COMPLAINANT'S NAME:

LOCATION OF OFFENSE:
915 Division Ave NE, 46 Washington, D.C. 20010

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
8:23 hours

DESCRIPTION OF WHAT HAPPENED:

5. Officers on scene also discovered that EASON's husband, Antonio TURNER, DOB: 05/23/1992, resided at the location and they were told that he had left for work that morning at 6:30 a.m. EASON was asked what happened and replied, "If you really want to know what happened, I truthfully believe he did it while pointing at M.E., who was in the hallway." EASON then yelled out, "He's evil." EASON was asked if other kids had injuries and she stated, "My son has a scratch" while pointing to the left side of three-year-old I.E.'s head. She made no mention of any other injuries and stated I.E. was asleep.

6. MPD Officer J. Alexander, one of the first responding officers to the scene and observed (on scene) a bump on the center of I.E.'s forehead and asked if that had always been there. EASON replied no. Officer Alexander then observed I.E.'s eye roll back into his head while being held by EASON, as if he was going in and out of consciousness. EASON put I.E. beside her on the couch and yelled out, "My son does not see this way," speaking about I.E., D.C. Fire/EMS was called back to assist I.E. Officer Alexander began to rub I.E.'s sternum to prevent him from falling asleep or passing out, fearing he may have head injury. I.E. appeared groggy, but started to respond and cry a little. EASON then laid I.E. down and took him to the bathroom. She said he was OK and that he was just sleepy. Officer Alexander asked for assistance from the EMS personnel on the scene.

7. Your affiant, who was assigned as the lead detective on this investigation, later learned from MPD's Youth and Family Services Division (YFSD) Detective Jeffery Affani that D.C. Fire/EMS Paramedic O'Bairne opined on the

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY
Exhibit D p. 005

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME:
Antonio Dale TURNER

NICKNAME:

ALIAS:

CGC:

PDID:

SEX: Male

Race: Black

DATE OF BIRTH: 5/23/1992

HEIGHT: 5'7

WEIGHT: 185

EYES: Brown

HAIR: Black

COMPLIANCE: Dark

SCARS MARKS LA TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
1839 Division Ave NE #6 Washington, DC 20002

TELEPHONE/HOBBIES:
(202) 331-1660

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
8:25 PM

LOCATION OF OFFENSE:
1839 Division Ave NE #6 Washington, DC 20002

CHARGES AND MEDICAL CONDITIONS (C & M):

Select a valid C & M Code below the inserted person when using the caution indicator:

90 = Assault and Battery

92 = Violent Tendons

10 = Mental Health

15 = Explosive Reaction

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

scene that the decedent sustained multiple system trauma which was consistent with physical abuse. Further, O'Byrne's subsequent report indicates that EASON told them that M.E. should be questioned because she believed that M.E. was a direct cause of the child's cardiac arrest.

8. Your affiant also learned that during the 911 call, EASON reported to the operator that C.E. was unconscious and unresponsive and that he had visible and obvious trauma to his body. Over the course of the call, EASON instructed M.E. to perform cardiopulmonary resuscitation (CPR) on the decedent because she was physically unable to do so. Over the duration of the 911 call, EASON never stated that she believed M.E. (or anyone else) was responsible for C.E.'s injuries.

9. As lead detective, your affiant went to the scene, personally observed the decedent's remains, and saw both old and new trauma to the decedent's head and torso, which included apparent scratches, bruises, and abrasions.

AUTOPSY

10. On April 2, 2020, Dr. Sasha BRELAND, OCMH Deputy Medical Examiner, conducted the decedent's post mortem forensic examination. At the conclusion of the examination, the following injuries were noted: abrasions and contusions to the head, face and torso; contusions to the heart and diaphragm; acute abdomen injuries.

AFFIANT'S SIGNATURE:

Anthony D. Jones

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd Day of October 2020

(ATTORNEY) DEPUTY CLERK SUPERIOR COURT OF THE

DISTRICT OF COLUMBIA

Revision Date: 11-29-08
Exhibit D p. 006

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale Turner
SEX: Male
DOB: 9/23/1992
HEIGHT: 5'7
WEIGHT: 183
EYES: Brown
HAIR: Black
COMPL. MARKS: Unknown

DEFENDANT'S HOME ADDRESS:
EKA 935 Division Ave NE, #6 Washington, DC 20019

COMPLAINT'S NAME:

LOCATION OF OFFENSE:
935 Division Ave NE, Washington, DC 20019

DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
8:25 hours

CAUTION AND REMINDER:
Select a valid CMC, color barcode for manual persons using the caution indicators:
- 80 = Assault and Battery
- 67 = Violent Tendencies
- 110 = Sexual Assault
- 145 = Explosive Disposition
- 61 = Exploitation
- 70 = Suicide
- 80 = Suicide
- 60 = Alcohol
- 50 = Drug Abuse

GOVERNING LAW.

AFFIDAVIT:

consisting of hemorrhaging of the soft tissue of the abdomen; liver laceration; right kidney laceration; multiple bilateral posterior rib fractures and heaking fractured ribs; and a small subdural hematoma to the left side of the brain.

Dr. BRELAND ruled the decedent's cause of death was multiple blunt force injuries and the manner of death was ruled a homicide.

11. On July 10, 2020, Dr. Breland issued the Autopsy Report for G.E., in which she detailed the following specific injuries to him:

- Multiple Blunt Force injuries
  - Head and cervical nervous system
    1. Marked swelling of head
    2. Bilateral periorbital ecchymoses
    3. Abrasions and contusions with associated subscalp hemorrhages
    4. Left temporal muscle hemorrhage
    5. Chipping (fracture) of outer table of frontal bone
    6. Left subdural hematoma, scalp
    7. Neoproliferation and Ophthalmic pathology consultations; refer to separate Medstar
    8. Georgetown University Hospital Pathology Consultation Reports

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

SUBSCRIBED AND SIGNED BEFORE ME THIS
22nd
October 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 10-29-20
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

TO WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Antwan Dale Turner

ASSISTANT UNITED STATES ATTORNEY

Exhibit D p. 007

---

<table>
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<tr>
<th>DEFENDANT'S NAME</th>
<th>Nickname</th>
<th>ALIAS(es)</th>
<th>CN:</th>
<th>RPD:</th>
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<td>Antonio Dale Turner</td>
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<td></td>
<td></td>
<td></td>
</tr>
</tbody>
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<table>
<thead>
<tr>
<th>SEX</th>
<th>RACE</th>
<th>DATE OF BIRTH</th>
<th>Height</th>
<th>Weight</th>
<th>Eye Color</th>
<th>Hair Color</th>
<th>Complexion</th>
<th>SCARS</th>
<th>TATTOOS</th>
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<tbody>
<tr>
<td>Male</td>
<td>Black</td>
<td>5/23/1992</td>
<td>5'7</td>
<td>140</td>
<td>Brown</td>
<td>Black</td>
<td>Unknown</td>
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</table>

<table>
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<tr>
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</thead>
<tbody>
<tr>
<td></td>
<td>(202) 332-166</td>
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LOCATION OF OFFENSE: 935 Division Ave NE, Washington, DC 20019
DATE OF OFFENSE: April 4, 2020
TIME OF OFFENSE: 8:25 a.m.

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

- of the corpus collosum (associated with trauma)
- Mild vitreous hemorrhage, bilateral
- No intraretinal or optic nerve sheath hemorrhages

Forcibly:

1. Abestasis and contusions
2. Bilateral rib fractures (They were examined by anthropologist Dr. Love, who found 36 rib fractures – 31 of which were acute and six were healing with a minimum of two traumatic events)
3. Posterior thorax hemorrhage
4. Posterior epicardial and proximal vena cava hemorrhages. (In Dr. Breden's opinion, this type of injury takes a tremendous amount of force)
5. Hemopericardium (6 milliliters of blood inside the pericardial sac)
6. Hemoperitoneum 150 millimeters of (blood inside abdominal cavity)
7. Left retroperitoneal hemorrhage (soft tissue back of abdomen)
8. Liver lacerations with subcapsular hematomas
9. Left kidney laceration
10. Perpicial and adrenal capsular hematomas
11. Left adrenal hematoma

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

---
Exhibit D p. 008

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO. 20-031489

DEFENDANT'S NAME:
Antonio Dale Turner

SEX: Male
RACE: Black
DOB: 5/2/1999
HEIGHT: 6'7
WEIGHT: 183
EYES: Brown
HAIR: Black
COMPLE: Dark
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
935 Division Ave NE, #2 Washington, DC 20019

COMPLAINANT'S NAME:

COMPLAINT NUMBER:

LOCATION OF OFFENSE:
935 Division Ave NE, #2 Washington, DC 20019

DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:21 AM

CAUTION AND MEDICAL CONDITIONS (CMCS)
Select a valid CMCS code below for wanted person when using this caution indicator:
00 = Arrest Warrant
05 = Violent Trespass
10 = Sexual Violent Predator
15 = Burglary
16 = Aggravated Assault
17 = Other
30 = Other
50 = Drug
60 = Alcohol
70 = Other Health
85 = Expensive
90 = Other

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

12. Bilateral spermatic cord hemorrhages
13. Bowed fractures

Dr. Breland noted that there were strangions or linear depressions on the back of G.J.'s head. She also noted that there were signs of early scabbing on some of the injuries which were less than 24 hours. There were cuts to G.J. on the face and on the left neck. There was blunt trauma to his genitals but, at this time, there is no evidence of a sexual assault. There were purple abrasions and there were bruise marks with a pattern around the child's nipples as well as on the back of the head. There was injury to the liver and kidneys which indicated that he sustained significant blunt trauma to the abdomen. Dr. Breland opined that G.J.'s right flank appeared to have been punched, kicked, slapped or hit with an object(s). There was injury to the child's legs and inferior rectus area. This type of injury could occur when a child is punched or hit in the chest. In Dr. Breland's opinion, the main cause of death was the significant head and abdominal trauma.

BACKGROUND AND INITIAL MED INVESTIGATION

13. TAJEANNA EASON is the biological mother of three children who were found injured on April 1, 2020. ANTONIO TURNER is not the biological father of these children. TURNER and EASON have had a romantic relationship for approximately one year and represented that they were married. They have lived together at the

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

Assistant United States Attorney

AFFIDANT'S SIGNATURE:
Anthony D. Greene

22nd October 20
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale TURNER

SEX: Male
DOB: 5/23/1992
HEIGHT: 5'7
WEIGHT: 185
EYES: Brown
HAIR: Black
COMPL: Dark
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
1333 3221 Division Ave NE, #6 Washington, DC 20019

COMPLAINANT'S NAME:

LOCATION OF OFFENSE:
335 Division Ave NE, #6 Washington, D.C. 20019

DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:15 hours

CAUSATION AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for involved person when using the caution indicator:

20 = Armed and Dangerous
25 = Escape Risk
26 = Sexually Violent Predator
28 = Assault
29 = Sexual Abuse
30 = Bond
50 = Substance
51 = Other (Explain)

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Division Avenue two-bedroom apartment since that time with three minor children, M.E., I.E., and G.E. In addition, on April 1, 2020, EASON was approximately nine months pregnant with TURNER’s child. That child later died of natural causes.

14. On or about April 1, 2020, EASON and TURNER had exclusive care and custody of the three minor children.

15. Following the initial on-scene investigation, EASON and her children (I.E. and N.E.) were transported Division Avenue to the Sixth District Station by MPD Detective George Taylor and Channel Howard. TURNER arrived separately at the Sixth District Station.

16. As MPD Detectives gathered information about G.E.’s death, EASON, TURNER, and I.E. were interviewed. While at MPD’s Sixth District Station, both EASON and TURNER were questioned about the events. While EASON was being interviewed, her son I.E. was sitting next to her in a chair. It was apparent that I.E. was having difficulty staying awake or alert and was slumping backward. EASON tried to make him sit up straight. During this time, I.E. had to use the station restroom and could barely walk—moving sideways and slowly. At one point, TURNER had to carry him to the bathroom.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR

Antonio Dale Turner

CHARGES:

SUBSCRIBED AND SWORN BEFORE ME THIS
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE DISRTICT OF COLUMBIA

Affiant's Signature:

Anthony D. Greene

22nd October 20
AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale Turner
MAGNITIZED: TURMER
SEX: Male
HEIGHT: 5'7
WEIGHT: 185
EYES: Brown
HAIR: Black
COMPL.: Unknown
DEFENDANT'S HOME ADDRESS:
7325 Division Ave NE., 86 Washington, D.C. 20019
COMPLAINANT'S NAME:
G.E.
LOCATION OF OFFENSE:
7325 Division Ave NE., 86 Washington, D.C. 20019
DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
8:35 a.m.
CAUTIONARY AND MEDICAL CONDITIONS (M.C.):
Select a valid CMC code before for wanted person when using the caution indicator.

OFFENSE: Assault and Battery
- 25 = Escaped
- 35 = Escape Bid
- 63 = Estabished
- 10 = Mental Illness
- 20 = Mandatory Parole
- 12 = Disorderly Conduct
- 05 = Alcohol
- 06 = Alcoholic

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

17. On April 1, 2020, D.C. Child and Family Services Agency (CFS) began a joint investigation with MPD regarding G.E.'s death. As a result, later in the day on April 1, CFS took 11-year-old M.E. and three-year-old I.E. to Children's National Medical Center (CNMC) for a medical evaluation. Subsequently, it was discovered that both children sustained apparent trauma to their bodies.

18. Following an examination of I.E. by CNMC medical staff, he was admitted to the Intensive Care Unit of Children's National Medical Center (CNMC), suffering from rib fractures (old and new), hemopneumothorax on his right side, liver laceration, right kidney injury, and a small amount of blood in his abdomen. Doctor McKinley of the CNMC hospital staff reported that I.E.'s injuries were caused by severe blunt force trauma.

19. Following an examination of M.E. by CNMC medical staff, it was learned that he weighed approximately 78 pounds and is a little over three feet tall. He had a healing black eye and appeared to have other injuries. M.E. disclosed to the CNMC Emergency Room physician that Antonio [TURMER] punched him in the eye, two weeks ago and his younger brother I.E. multiple times. He also said that his mother slapped him and hits his younger brother I.E. M.E. explained to the CNMC medical staff that he woke up on April 1, 2020, and heard his mother say that G.E. was killed. His mother had him lift up G.E. and then told him to perform CPR on G.E. M.E. told the CNMC medical personnel that he could still taste the saliva from G.E.'s mouth. M.E. also told them that he was afraid of his mother and did not want to go back home. He said that he was required to put up in the middle of the

AFFIANT'S SIGNATURE:
Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October, 2020
JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Exhibit D p. 011

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.: 20-0153489

DEFENDANT’S NAME:
Antonio Dale Turner

SEX: Male
RACE: Black
DOB: 5/21/1992
HGT: 5’7”
WGT: 185
EYES: Brown
HAIR: Black

ALIAS:

ASSES:

COMPL.

CCN:

5411-10

SCARS MARKS, TATTOOS:

DEFENDANT’S HOME ADDRESS:
LKA-293 Division Ave NE, #6, Washington, DC 20019

TELEPHONE NUMBER:
(202) 322-1169

DATE OF OON:
April 1, 2020

TIME OF OON:
8:25 a.m.

COMPLAINT’S NAME:
I.E.

LOCATION OF OON:
935 Division Ave NE, #6, Washington, D.C. 20019

DATE OF OON:
April 1, 2020

TIME OF OON:
8:25 a.m.

DATE OF CRIMINAL OFFENSE:
April 1, 2020

TIME OF CRIMINAL OFFENSE:
8:25 a.m.

CAUTION AND MEDICAL EXHIBITIONS (CMC): 80 = Assault and Battery 45 = Scare Risk 07 = Violent Tendency 34 = Sexually Violent Predator 50 = Mental Health Condition 54 = Explosive Response 55 = Alcoholic

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

1. I know that the defendant, Antonio Dale Turner, was present at the scene of the incident.
2. I further know that the defendant was involved in an altercation with another individual.
3. I further know that the defendant was carrying a weapon at the time of the incident.
4. I further know that the defendant was heard making threatening statements.
5. I further know that the defendant was observed committing a crime.
6. I further know that the defendant was involved in a domestic dispute.

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

AFFIDAVIT’S SIGNATURE:

Anthony D. Greene

22nd October 2020

SUBSCRIBED AND SWORN BEFORE ME THIS DAY OF October 20, 2020

(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 1/29/16
Superior Court of the District of Columbia

CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.: 20-0013189

<table>
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<tr>
<th>DEFENDANT'S NAME:</th>
<th>Anthony Dale Turner</th>
</tr>
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<tbody>
<tr>
<td>G/F: Black</td>
<td>915 3rd Street NE, Apt. 101, Washington, DC 20002</td>
</tr>
<tr>
<td>EYES: Brown</td>
<td>5'7''</td>
</tr>
<tr>
<td>HAIR: Black</td>
<td>155</td>
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<tr>
<td>COMPL. Dark</td>
<td>Uncertain</td>
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DEFENDANT'S HOME ADDRESS:

915 3rd Street NE, Apt. 101, Washington, DC 20002

DATE OF OFFENSE: April 2, 2020

TIME OF OFFENSE: 8:30 a.m.

INTERVIEW OF TAJEANNA EASON

23. On April 1, 2020, Detectives Chanel Howard and George Taylor interviewed EASON about the death of her son, G.E. The interview occurred at MPD's Sixth District Station. EASON reported that at approximately 8:30 a.m., she woke up and went to check on L.E. and G.E. When she went to the bedroom, she observed L.E. looking at television and G.E. appeared to be asleep. EASON stated that she called G.E.'s name, but he did not answer. She then observed a bruise on L.E.'s face and asked M.E. what happened. EASON reported that M.E. said something about them playing and that L.E. got hurt. EASON said she returned to the bedroom and noted that G.E. did not wake up to the sound of her voice and she went to check on him. She said that when she touched him, he was limp and cold to the touch. EASON said that she told M.E. to pick up G.E. while she called TURNER on the phone. EASON said that when TURNER did not answer, she called 911 for emergency assistance. EASON then ordered M.E. to perform CPR on G.E.

24. EASON told the Detectives that sometime after G.E. turned a year old, she started to notice bruises on him and further explained that she started to notice bruises on G.E. after she met TURNER. EASON stated that she initially thought TURNER was responsible for the injuries, but then assumed that the injuries happened when TURNER wasn't around, so she believed they were from M.E. EASON recalled that on one occasion, when she observed bruises on G.E., she and TURNER questioned M.E. about how G.E. was injured. EASON reported that

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

(Signed) 22nd October 20

SUBSCRIBED AND SWORN BEFORE ME THIS

(\(\text{\textasciitilde}\))

Rev. Date: 11-20-06
Exhibit D p. 013

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME: Antonio Dale Turner

SEX: Male
RACE: Black
DOB: 5/23/1992
HEIGHT: 5’7
WEIGHT: 185
EYES: Brown
HAIR: Black
COMPLEXION: Dark
SCARS, MARKS, TATTOOS: Unknown

COMPLAINANT’S NAME: G.E.

LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20018
DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 3:25 AM

CAUTION AND MEDICAL CONDITIONS (CMC): Select a valid CMC code below for each person named using the caution indicator.

- 90 = Armed and Dangerous
- 25 = Escape Risk
- 65 = Violent Temperament
- 10 = Mental Health Provider
- 15 = Explosive Personality
- 55 = Alcoholic
- 85 = Mentally Insane
- 70 = Diabetic
- 60 = Allergies

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

M.E. said he wasn’t responsible for the injuries and was unaware how G.E. got injured.

25. EASON stated that on another occasion, she observed what she described as a “slight bruise” on G.E. and she confronted TURNER and M.E. about the injury. EASON said that M.E. disclosed that TURNER was responsible for the injuries. EASON told the Detectives that shortly after that disclosure by M.E., she placed a surveillance camera in the children’s bedroom. EASON then said that she later removed the camera from the room after the children continued to play with the electrical cord.

26. EASON continued that after the two aforementioned instances, the unexplained injuries and bruising on G.E. stopped for a short period of time. EASON said she then noticed bruises that appeared to get worse. EASON also reported that on August 30, 2019, G.E. sustained a black left eye, which she thought was due to an allergic reaction. EASON said she took G.E. to Prince George’s Hospital for treatment. EASON informed a member of the hospital staff that G.E.’s eye was caused by being struck by someone. EASON further confronted TURNER and M.E. regarding the injury to G.E.’s eye and that M.E. admitted to hitting G.E. because he wouldn’t stop crying, although EASON also thought that TURNER might have been responsible for G.E.’s black eye. Specifically, EASON told the Detectives that M.E. said he slapped G.E. because he wouldn’t stop crying. EASON continued:

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

CHARGE(S): The First Degree Murder/Felony Murder (NEW 07/12/20)

ASSISTANT UNITED STATES ATTORNEY

22nd October 2020

SUBSCRIBED AND SWORN BEFORE ME THIS

JUDGE DEPUTY CLERK, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Affiant’s Signature:

Anthony D. Greene

Print Name:

APPROVED

Revision Date: 11-29-06
Exhibit D p. 014

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S NAME:
Antonio Dale TURNER

SEX: M
RACE: Black
DATE OF BIRTH: 5/23/1962
HEIGHT: 5’7
WEIGHT: 185
EYES: Brown
HAIR: Black

DEFENDANT’S HOME ADDRESS:
LKA 925 Division Ave NE, #6 Washington, DC 20609

C/O:
DEFENDANT’S TELEPHONE NUMBER:
(202) 332-1163

COMPLAINT’S NAME:
G.L.

LOCATION OF OFFENSE:
925 Division Ave NE, #6 Washington, DC 20009

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
5:23 hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for wanted person when using the caution indicator.

- 00 = Armed and Dangerous
- 05 = Violent Offender
- 10 = Most Wanted
- 15 = Fugitive

GO AHEAD BRIEFLY OF WHAT HAPPENED:

"So I lost his son. Yes, I did. I didn’t take much him up to the point where
he was done, but yes, I was mad, so -- because, as a matter of fact,
that was the time where he tried to blame Antonio for his eye and
that was impossible because they was in the room with me."

27. EASON stated that she and TURNER have both disciplined the children, but nothing more than a spanking or a smacking on the hand or buttocks. EASON said she thinks her son had something to do with G.E.’s death. EASON stated she is a religious person who feels and knows things and believes that M.E. “isn’t right.”

28. During the interview, EASON did not reveal to MPD that TURNER had hit the children in the past, even though MPD subsequently found a text message between EASON and TURNER where EASON asked TURNER why he hit one of her son’s so hard.

29. EASON told the Detectives that in the past, she had seen M.E. hit L.E. In response, she said she grabbed M.E. and threw him to the ground and smacked him on the face and head. EASON thought her son was “steady” and “well.” She further explained that she checked both G.E. and L.E. the day before (on March 31, 2020, as late as 10:30 p.m.), as well as two days before then. She claimed that neither had any visible injuries or COVID or that everything was fine.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

CHARGES: Child Endangerment, Murder, Misdemeanor Unlawful to Children

ASSISTANT UNITED STATES ATTORNEY

Affiant’s Signature:  
Anthony D. Greene

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd October 20
**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**

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<th>NICKNAME</th>
<th>ALT NAMES</th>
<th>UCN</th>
<th>PRID</th>
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<tbody>
<tr>
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<tr>
<th>SEX</th>
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<th>GT</th>
<th>HAIR</th>
<th>EYES</th>
<th>COMPL</th>
<th>SCARS</th>
<th>MARKS</th>
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<tr>
<td>Male</td>
<td>Black</td>
<td>2/22/1992</td>
<td>5'7''</td>
<td>6'1''</td>
<td>Brown</td>
<td>Green</td>
<td>Dark</td>
<td>None</td>
<td>None</td>
<td>TATTOO</td>
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<table>
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<tr>
<th>DEFENDANT'S HOME ADDRESS</th>
<th>TELEPHONE NUMBER</th>
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</thead>
<tbody>
<tr>
<td>123 Division Ave NW, #6</td>
<td>(202) 332-1463</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>COMPLAINANT'S NAME</th>
<th>TELEPHONE NUMBER</th>
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<tr>
<td>G.E.</td>
<td></td>
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<table>
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<th>LOCATION OF OFFENSE</th>
<th>DATE OF OFFENSE</th>
<th>TIME OF OFFENSE</th>
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<tbody>
<tr>
<td>923 Division Ave NE, #6, Washington, D.C.</td>
<td>April 1, 2020</td>
<td>8:25 AM</td>
</tr>
</tbody>
</table>

**CAPTIONS AND MEDICAL CONDITIONS (CMC)**

Select a valid CMC code below for noted person when using the medical indicator.

- 20 - Arming and Disarming
- 25 - Sexual Abuse
- 35 - Explosive Substance
- 65 - Poisening
- 66 - Overdose (Pain)
- 67 - Medication Required
- 68 - Alcohol
- 70 - Unknown Substance

**GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:**

30. EASON admitted that she disciplined all of her kids, including G.E. (who was the youngest), but claimed he did not get too much physical discipline. EASON further admitted that she would "plop his hands, plop his legs", or just say "look little boy don't do that." EASON added that she didn't really discipline G.E. or T.T. because they were small. She said, "If they do get hit, it's like a pop or a smack or they -- for the most part I'm yelling across the house." EASON denied using a belt.

**INTERVIEW OF ANTONIO TURNER**

31. On April 1, 2020, Antonio TURNER was interviewed by MPD Detectives Chad Howard and George Taylor at MPD's Sixth District Station. Later that same day, he was interviewed by your affiant and MPD Detective David Delmore at the Homicide Branch. TURNER reported that he has been involved with and married to EASON for about a year. TURNER reported that he is not the biological father of the decedent or his siblings.

32. TURNER stated that he and his wife left in the early morning hours (around 5:00 a.m.) on March 91, 2020, to take EASON to a doctor's appointment at George Washington University Hospital, leaving the children unattended by an adult, while three year old T.T. and two year old G.E. in the care of 11 year old M.T. TURNER reported that he believed his wife would be going both to their child, so he quickly went to the store to pick up food and household goods before going home to check on the children. TURNER indicated that the property was unoccupied.

**TO: WARRANT CLERK**

**PLEASE ISSUE A WARRANT FOR**

Antonio D. Turner

Charged with: Assault-Household/Intimate Partner

**JUDGE'S DEPUTY ON THR SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**

**SUBSCRIBER AND SIGNED BEFORE ME THIS 22nd DAY OF OCTOBER 2020**

[Signature]

[Date]
Exhibit D p. 016

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale Turner

DEFENDANT'S HOME ADDRESS: 1305 Division Ave NE, #3 Washington, DC 20019

CRIMINAL OFFENSE:

LOCATION OF OFFENSE:

DATE OF OFFENSE:

TIME OF OFFENSE:

CAUTIONARY MEDICAL CONDITIONS:

Select a CMC code below for each condition above:

00 = Anxious and Depressed
25 = Stressor
85 = Alcoholist
10 = High Risk
15 = Explosive

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

33. TURNER reported that when he arrived home, he found M.E. in the living room with the decedent (G.E.). TURNER said his weight bar (which he described as a skinny rod composed of metal bars) was on the sofa next to the decedent. Your affiant states that on the scene, there was also a small pull-up bar which weighed twenty-five pounds. TURNER stated that in the past, he had asked M.E. not to handle the weight bar. TURNER became upset and said he smashed the decedent's head and struck M.E. in the head and kicked him in the body. TURNER stated he did this to discipline M.E. and G.E. TURNER also stated that he checked in the children's bedroom and observed M.E. holding his head. TURNER did not attempt to get any medical assistance for M.E. and left the apartment and went to the hospital. TURNER added that before leaving, he grabbed his "medicine" (serotonin to treat his ADHD) and some mood for his wife and returned to the hospital.

34. TURNER continued that later that afternoon (March 31), he returned home with EASON. TURNER said he told M.E. to feed his brothers and then went to the bedroom to watch television. TURNER reported that EASON was already in their bedroom taking a nap. TURNER further stated that on the evening of March 31, he observed M.E., I.P. and the decedent (G.E.), and they all appeared to be in good health.

35. TURNER (told MPD) that in the early morning hours of Wednesday April 1, 2020, he left the home to go to

AFFIANT'S SIGNATURE: Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner
Charge(s): Murderer/Assailant (Counts to Child)er
Assistant United States Attorney

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd Day of October 2020

(Judge) Deputy Clerk Superior Court of the District of Columbia
Exhibit D p. 017

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: R. Turner

NICKNAME: Aliases:

DATE: 2005

SEX: Male

DATE OF BIRTH: 5/23/1992

HEIGHT: 5'7"

WEIGHT: 185 lbs

EYES: Brown

HAIR: Black

COMPLEXION: Unknown

SCARS, MARKS, TATTOOS:

LOCATION OF OFFENSE: 925 13th St. NW, 1201 Washington, D.C., 20010

DATE OF OFFENSE: April 1, 2020

TIME OF OFFENSE: 8:23 PM

CAUTION AND MEDICAL CONDITIONS (CMC):

[Entries are redacted]

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Work and that later in the morning, he received a call from EASON saying that G.E. was unconscious and that the police were at the house.

36. During the interview, TURNER admitted to Detectives that he physically disciplined the children. M.E. the now, but added that was how he was raised. TURNER stated it was his belief that if a child misbehaved, then they should be dealt with accordingly. Detectives inquired about the incident in January 2020, where the decedent sustained a severe laceration to his head while under his care. TURNER reported the injury was caused by the decedent falling off a bed. TURNER stated that he phoned EASON to report the injury. TURNER said that during the incident, he also punched M.E. for allowing her younger siblings to do what they want. TURNER told the Detectives that he handled M.E. “as an adult” when explaining how he disciplined him during this incident.

37. TURNER spoke with Detectives about another instance where the decedent sustained an “unexplained” eye injury (black eye). TURNER stated that when he asked M.E. about the injury, his explanation wasn’t sufficient, so TURNER punched M.E. in the face to teach him a lesson.

38. TURNER told the Detectives that in another instance, he punched M.E. in the arm and chest to demonstrate to M.E. how it feels to hit someone. TURNER said that he beat up M.E. one time, giving him a “teenager whooping.” TURNER said he “went to his body, like my father did me” to describe that particular incident.

Affiant's Signature: x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

CHARGE: [Charges Listed Here: Theft, Burglary, etc.]

SUBSCRIBED AND SWORN TO BEFORE ME THIS 22nd Day of October 2020

[Signature]

Questionable Date: 10/20/2020
 Affidavit in Support of an Arrest Warrant

Exhibit D p. 018

Superior Court of the District of Columbia

CRIMINAL DIVISION

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner
Charges: Assaulting Elderly or Infirm Person (Violence to Elderly)
Assaulting Elderly or Infirm Person (sexual assault to Elderly)

ASSISTANT UNITED STATES ATTORNEY

Exhibit D p. 018

Affiant’s Signature:

x Anthony D. Greene

22nd October 2020

SUBSCRIBED AND SWORN BEFORE ME THIS

DOY OF

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE

DISTRICT OF COLUMBIA

Date of Issue: 11-05-06

Revision Date: 11-05-06

The text of the document is not displayed. It appears to be a legal document, possibly related to a criminal case, involving charges against Antonio Dale Turner. The document includes personal information about Turner, the charges against him, and the signature of the affiant. The date of issue and the signature of the judge are also mentioned.
### Superior Court of the District of Columbia
**Criminal Division**

### Affidavit in Support of an Arrest Warrant

<table>
<thead>
<tr>
<th>Defendant's Name</th>
<th>Nickname</th>
<th>Aliases</th>
<th>CNS.</th>
<th>CCN.</th>
<th>PDD.</th>
<th>ODID.</th>
</tr>
</thead>
</table>

**Address:**

USA 931 Division Ave NE, #6 Washington, DC 20019

**Phone Number:**

123-323-1663

**Complainant's Name:**

G.E.

**Location of Offense:**

931 Division Ave NE, #6 Washington, DC 20019

**Date of Offense:**

April 4, 2020

**Time of Offense:**

8:23 hours

**Caption and Medical Conditions (CMC):**

Select a valid CMC code below for related persons when using the caption indicator.

- 01 = Armed and Dangerous
- 25 = Escape Risk
- 33 = Violent Tendencies
- 70 = Alcohol Abuser
- 60 = Drug Abuser

**Give a Brief Description of What Happened:**

41. While at the hospital, M.E. disclosed to the doctors that he was beaten by Turner [see above paragraph 19].

42. On April 4, 2020, prior to M.E.'s medical examinations and before he told the medical staff about the physical abuse, he was interviewed by Detectives Howard and Taylor. The interview was conducted with M.E.'s knowledge and consent. When the Detectives first met M.E., he had a black eye. Prior to the interview, while in a police vehicle in route to MPD's Sixth District Station, M.E. stated to Detective Howard that he knew his mother was going to blame him and that "CFB" was going to take him away.

43. M.E. told the Detectives that on March 31, 2020, his mother had a doctor's appointment in the morning and that when he woke up, Turner was already gone. M.E. said that later in the afternoon, his mother and stepfather returned home with pizza. M.E. said that Turner told him to feed his siblings, so he warmed up the pizza and gave the pizza to his brothers. M.E. reported that later in the evening, he put on a movie and his brothers fell asleep. M.E. stated that he stayed on the sofa in the living room and that his brothers slept in the bedroom.

44. M.E. told the Detectives that the next morning, his mother went to his brothers' bedroom to check on I.E. and G.E. M.E. said his mother observed a bruise on I.E.'s face and asked I.E. what happened. But I.E. did not answer. M.E. reported that G.E. appeared to be asleep. His mother said G.E. looked pale and asked him (M.E.) to

**Affiant's Signature:**

[Signature]

**Warrant Clerk:**

[Signature]

**Date:**

October 20, 2022

**Judicial Deputy Clerk:**

[Signature]

**Superior Court of the District of Columbia**

**Assistant United States Attorney:**

[Signature]

**Date:**

11-24-2022

**Revision Date:**

11-25-2022
Exhibit D p. 020

Superior Court of the District of Columbia
CRIMINAL DIVISION

APFDATIV IN SUPPORT OF AN ARREST WARRANT  USW NO.: 

DEFENDANT'S NAME: Antonio Dale TURNER

NICKNAME: 

DATE OF BIRTH: 9/23/1992

RACE: Black

HEIGHT: 5'7"

WEIGHT: 185

EYES: Brown

HAIR: Black

COMPL: Unknown

SCARS, MARKS, TATTOOS:

DEFENDANT'S HOME ADDRESS:

1333 Division Ave NE, #6 Washington, D.C. 20019

TELEPHONE NUMBER:

(202) 332-1663

COMPLAINANT'S NAME: G.E.

LOCATION OF OFFENSE:

935 Division Ave NE, #6 Washington, D.C. 20019

DATE OF OFFENSE: April 1, 2020

TIME OF OFFENSE: 9:25 a.m.

CAUTION AND MEDICAL CONDITIONS (CMC)

Select the valid CMC next below for named person whose using the caution indicator:

65 = Epilepsy
66 = Other (Specify)
35 = Accidental
20 = Saturated
0 = Illigitamite
30 = Heart Condition
40 = Diabetes
10 = Alcoholism
55 = Insane
85 = Homosexual
56 = Known to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

pick him up. M.E. said that when he picked up G P ., his mother realized he was limp and lifeless and started to scream. M.E. said his mother then called 911.

45. M.E. was later asked during the interview if he was ever disciplined by TURNER. M.E. responded yes. Detectives asked M.E. to talk about how he got a black eye, but M.E. said he did not want to talk about it.

46. On April 6, 2020, a forensic interview of M.E. was conducted at the Children's Advocacy Center in Virginia. During that interview, M.E. reported the following:

- He felt safe at the home of his new foster parent.
- When asked if he felt safe at his home (935 Division Avenue NE, Apartment 6A) with his mother and stepfather Antonio [TURNER], he said no and said it felt like a "death trap."
- He usually gets blamed for injuries to his younger siblings because he's usually with them.
- His mother didn't realize that "the marks and bruising rampage" started when Antonio [TURNER] came around.
- Antonio [TURNER] would beat G.E. and I.E. when his mother was either not around or not in position to hear the abuse.
- Once his mother observed the injuries to his siblings, she would blame M.E. for their injuries.
- The last assault on G.E. and I.E. took place a few days prior to when his mother [LASON] and Antonio

AFFIANT'S SIGNATURE:

Anthony D. Greene

22nd October 2020

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd October 2020

JUDICIAL DEPUTY CLERK SUPREME COURT OF THE
DISTRICT OF COLUMBIA
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME:
Antonio Dale Turner
NICKNAME:
ALIAS:
SEX:
Male
RACE:
Black
DOB:
HEIGHT:
5'7
WEIGHT:
185
EYES:
Brown
HAIR:
Blond
COMPL.
Uncharged
SCARS:
MARKS:
TATTOOS:
Telephone Number:
(302) 333-1463

COMPLAINANT'S NAME:
G.E.

LOCATION OF OFFENSE:
293 Division Ave, N.E., #6 Washington, D.C. 20019

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
8:05 hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for each person named in the caution indicator

- 50 = Arson and Explosives
- 20 = Explosive Device
- 30 = Sexually Violent Predator
- 10 = Sexual Assault
- 60 = Medication Required
- 85 = Hemophilia
- 20 = Addict
- 30 = Alcoholic

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

[TURNER] went to her doctor's appointment on the morning of March 31, 2020, leaving them home alone. During that assault, M.E. reported that he heard sobs and his brother started to cry before Antonio [TURNER] told them to "SHUT UP, SHUT UP!"

- He locked up a video on YouTube that praised step parents making lives miserable for children.
- He believed that his step-father, Antonio [TURNER], would stop abusing his brothers when they were able to talk and articulate themselves.
- After what he thought was the last assault on his brothers, Antonio [TURNER] kept them covered up with sleeping bags. M.E. described the kids as walking slower than they usually do after the last assault.
- The day after the last assault, he observed marks on I.E.'s neck, which his mother immediately blamed M.E. for inflicting.
- M.E. reported historical beatings at the hands of his mother, using the palms of her hands, her fists, and a belt.
- His step-father Antonio [TURNER] would punch him and his younger siblings leaving marks. M.E. described his step-father as using his nails to leave marks on his neck.
- His step-father was aggressive to I.E. and G.E.

47. M.E. denied hitting C.E. or I.E. except for hitting them to keep them away from their mother's bedroom, which he had been instructed to do so that she could rest. Initially, M.E. stated that Antonio [TURNER] only

AFFIANT'S SIGNATURE:
Anthony D. Greene

TO: WARRANT CLERK
PLEA: ISSUE A WARRANT FOR:
Antonio Dale Turner

CHARGE: Child Sexual Abuse

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd Day of October, 2020

[Signature]
JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

[Signature]
AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale Turner
NICKNAME: 
ALIASES: 
CLN: 20-055489
PFD: 460-130

SEX: Male
RACE: Black
DOB: 5/23/1992
HEIGHT: 5'7
WEIGHT: 185
HAIR: Brown
EYES: Unknown
COMPL. DATE: 
SCARS, MARKS, TATTOOS:

DEFENDANT'S HOME ADDRESS: LKA 923 Douglas Ave NW, #6 Washington, DC 20019

TELEPHONE NUMBER: (202) 332-1663

COMPLAINT'S NAME: 
RELATIONSHIP: 
LOCATION OF OFFENSE: 911 915 Division Ave NW Washington, DC 20010
DATE OF OFFENSE: 
TIME OF OFFENSE: 

CAUTION AND MEDICAL CONDITIONS (CMC)

SELECT A VALID CMC CODE BELOW FOR THEgeführt PERSON WHEN USING THE CMC INDICATOR.

10 = Armed and Dangerous
30 = Violent Criminal
40 = Sexually Violent Predator
50 = Mental Illness
60 = Opiate Use
70 = Alcoholism
80 = HIV 
90 = Other (Specify)

15 = Culinary Expertise 
20 = Deaf or Hard of Hearing
35 = Blind or Partially Sighted
45 = Engaged in Drug Abuse

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

disciplined him if he did not listen to his mother - which was a rare occasion. He stated that the last time he was disciplined was right after they were sent home from school. He said Antonio [TURNER] snatched his hand because they were playing a game and Antonio [TURNER] was trying to get to the controller first.

INJURIES AND CONDITION OF I.E.

On April 7, 2020, your affiant and Detective Howard conducted a follow-up telephone conference call with CNMC Doctor Adrienne Aris, who is an expert in child abuse and has been qualified as such in the District of Columbia, Maryland, and Georgia. Dr. Aris examined and treated I.E. on April 1, 2020, and prepared a Child and Adolescent Protection Center (CAPC) consult report with the following medical findings:

- I.E. suffered several different injuries, including fractured ribs and a lacerated liver.
- There is evidence of old and new rib fractures, with the older healing rib fractures occurring at least two weeks prior to I.E.'s presentation to the hospital on April 1, 2020.
- Observed bleeding in the lumenoccludensia in space and air around the lungs, and abdominal cavity, which most likely came from the liver. It is Dr. Aris' opinion that the amount of force to injure the liver would be

AFFIANT'S SIGNATURE: Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner
Charge: FELONIOUS HOMICIDE; FELONIOUS ASSAULT (VIOLENCE TO CHILDREN)

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF October 2020 

(DUTCH) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-25-06
Exhibit D p. 023

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT’S FULL NAME: Alexandria Daril Turner
SEX: Male
RACE: Black
DOB: 3/23/1992
HEIGHT: 5’7
WEIGHT: 185
EYES: Brown
HAIR: Black
COMPLIMENTARY MARKS: Unknown
DEFENDANT’S HOME ADDRESS: 935 North Ave NE, #6 Washington, DC 20019
TELEPHONE NUMBER: (202) 322-1663

COMPLAINANT’S NAME: G.E.
LOCATION OF OFFENSE: 935 North Ave NE, #6 Washington, DC 20019
DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:25 p.m.

GIVEN MEDICAL CONDITIONS (CMC)

60 = Assault and Battery
65 = Extreme Risk
20 = Vision Disturbance
10 = Severe Vision Pressure
10 = Handicap
80 = Medication Required
30 = Alcohol
55 = Alcohol
20 = Aversion to abuse drugs

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

... (text continues to several paragraphs on injuries and medical conditions...)

TO WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

[Signature]

22nd October 20

SUBSCRIBED AND SWORN BEFORE ME THIS
[Signature]

JUDGE DEPUTY CLERK, SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-05-06
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

Defendant's Name:  Amanda Dale Turner
Alias:  
Sex:  Male
Race:  Black
DOB:  5/31/1992
Height:  5'7"
Weight:  153 lbs
Hair:  Brown
Eyes:  Brown
Complexion:  Sallow
Scar Marks/Identifying Marks:  Tattoo on left arm

Complainant's Name:  
Location of Offense:  933 Division Ave NE, Washington, D.C. 20019
Date of Offense:  April 1, 2020
Time of Offense:  8:31 a.m.

Offense:  
90 = Other (Explain)
33 = Sexually Violent Predator
76 = Robbery
87 = Narcotics
25 = Assault
98 = Contributing to the Delinquency of a Minor
92 = Intoxicated
60 = Explosive Device

Give a brief description of what happened:

- I.E. did not display any traumatic interior injury to the brain and head, but exterior injury to the face was noted. The exterior physical injuries sustained by I.E. would have been immediately present and visible to the caretaker(s) of I.E.

NOTE: On June 5, 2020, in a follow-up consultation with Dr. Aris, she stated that I.E. should have been or would have been in extreme discomfort, and exhibited signs of discomfort as a result of the injuries he sustained. He would not have been able to walk normally, play on a tablet, or eat.

- Dr. Aris observed bruising behind I.E.'s ears and scalp, dark blue-purple around the right eye, and scars to his head. There were red linear patterns on the back, which could be consistent with being hit with a belt, and linear marks on the chest, which also could be consistent with being hit with a belt.

- I.E.'s injuries would have been immediately present and visible to I.E.'s caretaker. I.E.'s injuries were so obvious that a caretaker, especially a parent, would have known or should have known that I.E. required immediate medical attention.

- I.E. did not require surgery to treat his injuries, but, as a result of the severity of his injuries, he could have had complications which caused him to die.

Affiant's Signature:  X  Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner
Charges:  
Assistant United States Attorney

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd Day of October, 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA
**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**

<table>
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<th>DEFENDANT'S NAME:</th>
<th>S/NICKNAME:</th>
<th>Alias(es):</th>
<th>CGN:</th>
<th>USW No.:</th>
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<tr>
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<td>A.D. Turner</td>
<td>Turner</td>
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<td>595718</td>
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<tr>
<td>M</td>
<td></td>
<td>5/24/1992</td>
<td>5'3</td>
<td>183</td>
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<td>Black</td>
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<th>Telephone Number:</th>
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<tbody>
<tr>
<td>10525 Division Ave NE, #6 Washington, DC 20019</td>
<td>(202) 332-1663</td>
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<table>
<thead>
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<th>Complainant's Name:</th>
<th>Telephone Number:</th>
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</thead>
<tbody>
<tr>
<td>G.E.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
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<th>Location of Offense:</th>
<th>Arrest Date:</th>
<th>Time of Offense:</th>
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<tbody>
<tr>
<td>3155 Division Ave NE, #6 Washington, D.C. 20019</td>
<td>April 1, 2020</td>
<td>8:25 a.m.</td>
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</tbody>
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**CAUTION AND MEDICAL CONDITIONS (C&M)**

Select a valid C&M code below for any medical problems when using the caution initiative:

- 00 = Armed and Dangerous
- 05 = Violent Offender
- 06 = Mentally Ill
- 07 = Sexual Predator
- 10 = Medically Required
- 20 = Known to Abuse Drugs

**ADDITIONAL MPD INVESTIGATION**

49. During the course of this investigation, your affiant learned that M.E. attempted to have his foster parent change his cellular telephone device following his placement with the foster parent on April 1, 2020. The foster parent was directed to remove the cellular device until it could be obtained by MPD.

50. On April 6, 2020, MPD Detective Jerry Afari met with M.E.’s foster parent, who turned over M.E.’s black LG cellular device that has a registered telephone number of 202-677-1427, with model number LM-Q710MS. Detective Afari then gave the aforementioned cellular device to your affiant, pending the issuance of a D.C. Superior Court search warrant to download its contents for evidence in this investigation.

51. Both TURNER (see above statement to MPD) and EASON (see below statement of W-2 of a conversation with EASON) claimed that one of G.E.’s prior injuries occurred when he fell off a bed. Your affiant reviewed the crime scene photographs from the scene and observed that in the bedroom utilized by G.E. and I.E., there were two twin beds with a sleeping bag on each of the beds.

52. Additionally, during the course of the investigation, your affiant sought the assistance of MPD Detective Robert Edeken, who conducted an examination of the cellular telephone belonging to TURNER. The examination

**AFFIANT’S SIGNATURE:**

x Anthony D. Greene

**TO:** WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charged With: First Degree Murder/Intent Murder (Usufruct of Child)

Assistant United States Attorney

Form Dates: Not Approved

**SUBSCRIBED AND SWORN BEFORE ME THIS 21st DAY OF October, 2020**

[Judge/Deputy Clerk] Superior Court of the District of Columbia
Supreme Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

<table>
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<th>DEFENDANT'S NAME:</th>
<th>Supernova Turner</th>
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<td>Gender:</td>
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<tr>
<td>Race:</td>
<td>Black</td>
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<tr>
<td>Date of Birth:</td>
<td>5/23/1992</td>
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<tr>
<td>Height:</td>
<td>5'7&quot;</td>
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<td>Eyes:</td>
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<tr>
<td>Complexion:</td>
<td>Unknown</td>
</tr>
<tr>
<td>Scars, Marks, Tattoos:</td>
<td></td>
</tr>
</tbody>
</table>

Defendant's Home Address:
935 Division Ave NE, Suite 100
Washington, DC 20019

Complainant's Name:
Eason

Location of Defense:
935 Division Ave NE, Suite 100
Washington, DC 20019

Date of Offense:
April 1, 2020

Time of Offense:
8:30 a.m.

Caution and Medical Conditions (CMC)
Select a valid CMC code below for an injured person when using the caution indicator:

- 00 = Armed and Dangerous
- 25 = Eaton Risk
- 30 = Sexually Violent Predator
- 35 = Heart Condition
- 50 = Medication Required
- 55 = Alcohol
- 65 = Drunk
- 70 = Social
- 80 = Mental Health
- 90 = Medical
- 99 = Other

Give a brief description of what happened:

Revealed several text messages contained in the phone to a contact named "My Gumball" and listed to telephone number 202-491-1680. This phone number is EASON's.

TIMELINE OF ADDITIONAL EVENTS:

53. On September 14, 2018, EASON registered G.E. to attend an early childhood development center (ECDC) in Washington, D.C. In the admissions records for ECDC, EASON stated that she handled most of the discipline. Both G.E. and I attended ECDC.

54. A teacher at ECDC, hereinafter referred to as W.I., explained that at the beginning of each day, if a teacher saw a mark upon a child during check-in for ECDC, then the mother/caregiver was supposed to write a note explaining how the child received an injury. During the day, if a teacher saw a mark, the teacher was supposed to write a report and inform the parent.

55. On May 22, 2019, at about the same time that EASON began dating TURNER, W.I. observed G.E. with a black eye. When asked by the ECDC about it, EASON stated that G.E. and his brother got hold of the boxing gloves and the brother hit him in the eyes.

Affiant's Signature:
X Anthony D. Greene

To: Warrant Clerk
Please issue a warrant for:
Antonio Dale Turner

Charges: First-Degree Murder (Intoxicated, Child), Second-Degree Murder (Intoxicated, Child)

Assistant United States Attorney

NCAAPPROVED

Subscribed and sworn before me this 22nd day of October, 2020

(Judge) Deputy Clerk Superior Court of the District of Columbia

NCAAPPROVED

Revision Date: 11-29-20
Exhibit D p. 027

Supior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale TURNER

SEX: Male
RACE: Black
DOB: 5/23/1992
HEIGHT: 5'7
WEIGHT: 185
EYES: Brown
HAIR: Black
COMPLIANCE: Dark
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
1105 Division Ave NE, #6 Washington, DC 20019

PHONE NUMBER:
(202) 332-1663

COMPLAINANT'S NAME:
G.E.

LOCATION OF OFFENSE:
905 Division Ave NE, #6 Washington, DC 20019

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
1:35 hours

CAUTION AND MEDICAL CONDITIONS (CMC)
Select a valid CMC code below for named person when using the caution letter.

60 = Armed and Dangerous
65 = Agitated
66 = Violent Tendencies
67 = Sexually Violent Predator
68 = Mentally Insane
69 = Mentally Ill
70 = Under the Influence
71 = Controlled Substance
72 = Intoxicated
73 = More than 40 grams of cocaine
74 = Excessive Alcohol
75 = Explosive Substance
76 = Explosive Device
77 = Methamphetamine
78 = Meth
79 = Heroin
80 = Heroin
81 = Other (Specify)
82 = Opiate
83 = Opiate
84 = Opiate
85 = Opiate
86 = Opiate
87 = Opiate
88 = Opiate
89 = Opiate
90 = Opiate
91 = Opiate
92 = Opiate
93 = Opiate
94 = Opiate
95 = Opiate
96 = Opiate
97 = Opiate
98 = Opiate
99 = Opiate

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

56. On June 14, 2019, W-1 noticed marks on G.E.'s back but was not sure what they were. W-1 informed the director of BAC, hereinafter referred to as W-2. BAC was called and claimed that she did not know what caused the marks. EASON stated she would take G.E. to the doctors. At this time, it is not known if EASON took G.E. for medical treatment.

57. On August 30, 2019, the decedent attended the BAC and was observed to have unexplained trauma to his eye (black eye). Specifically, W-2 reported that on that day, EASON brought G.E. to the BAC with an unexplained black eye. W-2 told EASON to take G.E. to a doctor. W-2 reported that when IT questioned EASON about the injury to G.E., EASON produced documents from a doctor medically clearing the decedent to return to school. W-2 stated that this incident was not reported to CSA because of EASON's rationale for the injury and the medical clearance. When questioned about the trauma to G.E.'s eye, EASON told the BAC that G.E. fell in the closet and hit his eye on a toy. [NOTE: See below for comparison with the hospital records, indicating that EASON told the hospital that she thought his eye injury was a bug bite or allergies.]

58. According to medical records obtained from Prince George's Hospital relating to G.E. and care provided on August 30, 2019, when asked how the cause of G.E.'s eye swelling, EASON responded that something might have hit him. The medical staff diagnosed him with a black eye (left periorbital ecchymosis also described as raccoon eyes) and some eye abrasions. The medical record notes further describe:

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

AFFIANT'S SIGNATURE:

ANTHONY D. GREENE

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF OCTOBER 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

--SEAL--
EASON claimed that on the previous evening, she was on her computer, while the “father” whom she also refers to as her “husband” was watching the children in the other room with a 2-year-old (J.E.) and a 10-year-old (M.E.). EASON stated the doors were off track on the closet and the father stated he had to get the child out of the closet. G.E. fell asleep on the couch and woke up crying. Later she observed discolored around the left eye. He was not observed to fall off the couch. She ran out when she heard G.E. cry, but did not see any injury. EASON stated she gave the child Benadryl because she thought he was having an allergy. EASON further stated that in the past, her 2-year-old had a black eye from the knobs of the closet. EASON claims that she did not suspect child abuse by the father. EASON did not want a CT scan because she did not want to expose G.E. to radiation and have him sedated.

59. On October 7, 2019, ECDC staff observed that G.E. had bruising on the sides of his face and ears. In a signed note to ECDC, EASON claimed the injuries came from G.E. playing too roughly with siblings and that she had a talk with the older brother about playing too rough with G.E.

60. On October 9, 2019, ECDC staff observed G.E. with unexplained bruises on his ears. EASON could not explain how G.E. sustained the bruises. W.2 explained to EASON that they were reporting the matter to CPSA.

[Signature]

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner
Charge With: First Degree Murder, Second Degree Murder (Vandal to Child)
Assistant United States Attorney

Subscribed and Sworn Before Me This 22nd Day of October, 2020

(Judge) Deputy Clerk Superior Court of the District of Columbia
Exhibit D p. 029

### AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

#### Defendant's Name: Antonio Dale Turner  
#### Nickname:  
#### Alias(es):  
#### DOB: 5/21/1992  
#### Height: 5'7"  
#### Weight: 185  
#### Eye(s): Brown  
#### Hair: Black  
#### Complexion: Unknown  
#### Scars, Marks, Tattoos:  

#### Defendant's Home Address: 513 Division Ave NE, #6 Washington, DC 20017  
#### Telephone Number: (202) 333-1663  

#### Complainant's Name: G.E.  
#### Location of Offense: 915 Division Ave NE, #5 Washington, DC 20017  
#### Date of Offense: April 1, 2020  
#### Time of Offense: 8:25 AM  

#### CAUTION AND MEDICAL CONDITIONS (COCHR):  
- Hit and Run Accident  
- 25 - Fugitive  
- See under other (Explanations)  
- 90 - Medication Required  
- 95 - Homosexual  

#### GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:  

61. Beginning October 16, 2019, Investigator LiNeda Blake from MPD's YFSD investigated the assault allegations. W-2 told Blake that she approached EASON about the bruises on G.E.'s ears. EASON could not explain how he sustained the bruises. W-2 stated that she told EASON that she would be calling CPSA for the injuries because it is ECDC policy. EASON understood why the notification was being made. W-2 stated that EASON is a very mild-mannered person that has never had any problems with the staff. W-2 stated that on a previous occasion, G.E. was observed with a black eye and that when EASON was asked about it, she stated that G.E. fell and hit his head on some toys in the closet. W-2 reported that EASON stated that the children in her household play roughly with each other on a daily basis, so bruises probably came from playing in the house.

62. Subsequently, EASON told Investigator Blake that she did not have the slightest idea where G.E. got the bruises on his ears. According to EASON, the boys were playing football in the house the previous week. Eason stated that she was aware of the scratches that were visible on the side of G.E.'s face, but did not see any bruises on his face. EASON stated that G.E. never cried or complained of any pain to her ears. EASON claimed that although G.E. is the smallest child in the household, he liked to play rough. She added that G.E. liked to hit the older children (the 5-year-old and 11-year-old). EASON stated that she asked all the other children if anything happened while playing with G.E. and the kids stated that nothing happened. EASON reported that she does not use any type of physical discipline in the household. She explained that she typically yells at the kids when they are playing too rough.

### AFFIDANT'S SIGNATURE:  

x Anthony D. Greene  

#### TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:  

[Signature: Antonio Dale Turner]  

[Signature: Assistant United States Attorney]  

22nd October 2020  

[Signature: Deputy Clerk]  

[Signature: Judge]  

[Signature: Superior Court of the District of Columbia]  

Redacted Date: 22-08-06
and she threatens to “pluck” them but she never does. When the children at the household get in trouble, they are typically punished.

63. On October 17, 2019, EASON sent the following text message to TURNER:
   “The lady from child care. She said they are clearing out the case. She said there is no sign of abuse.”

64. On October 18, 2019, CPSA filed a report with MPD about the October 9, 2019 incident.

65. On October 24, 2019, EASON sent the following text to TURNER:
   “So after that long talk this nigga leaves a peanut butter n jelly sandwich on the table n doesn’t put pajamas on the kids.”

66. On October 31, 2019, TURNER sent the following text to EASON:
   “I’m trying to sleep and your son keep crying I think that’s rude and (A.L.E.) not saying nothing.”

That text was followed by (eight minutes later):
   “All I said was that your son was crying I don’t think that’s fair that (A.L.E.) telling them to lay down and you not doing nothing about you right there.”
Exhibit D p. 031

Superior Court of the District of Columbia  
CRIMINAL DIVISION

APPENDIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME:  
Antonio Dale Turner

NICKNAME:

ALIASES:

SEX: Male  
RACE: Black  
DOB: 5/21/1992  
HEIGHT: 5'7"  
WEIGHT: 185  
EYES: Brown  
HAIR: Black  
COMPLEXION: Dark  
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:  
623 25th Street NE, #2, Washington, D.C. 20002

TELEPHONE NUMBER:
(202) 335-1965

COMPLAINANT'S NAME:  
GL

LOCATION OF OFFENSE:  
623 Division Ave NE, #2 Washington, D.C. 20002

DATE OF OFFENSE:  
April 1, 2020

TIME OF OFFENSE:  
11:25 p.m.

CAUTION AND MEDICAL CONDITIONS (C59):  
Select a valid CMC code below for named person when using the racing indicator.

00 = Arrested and Deprived of Liberty  
01 = Sexual Intercourse  
02 = Violent Intimidation  
03 = Sexually Violent Predator  
10 = Arson  
11 = Aggravated Assault  
12 = Burglary  
13 = Robbery  
15 = Explosive Substance  
16 = Methamphetamine  
17 = Heroin

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

[NOTE: Your affiant believes that M.E. is referring to her son M.E.]

67. On November 9, 2019, as later discovered from a video obtained from M.E.'s cell phone, M.E. video-taped himself cleaning up the dining room area. The video shows him with both his brothers (J.E. and G.E.), who are in the background. M.E. is seen doing laundry and vacuuming. Loud music (no explicit lyrics) can be heard and TURNER is seen on the video at times. At one point, a female voice (apparently EASON) calls out for M.E. and he goes off-camera into the other room. The audio picks up EASON yelling and there is a loud smack. M.E. screams out in pain. A few seconds later, M.E. walks back into camera view. He is crying and throws something on the floor, saying that he didn't do anything. About a minute later, EASON is scolding M.E., and there are additional loud smacks. M.E. cries out in pain. EASON tells him "You know what (inaudible) fuck, shut the fuck up. You know exactly what the fuck you said." EASON continues to yell. M.E. comes back into camera view, crying and holding his mouth. TURNER asks M.E. "do you know what happened?" M.E. said no and tried to explain why he got in trouble. M.E. continues to clean up.

68. On December 17, 2019, EASON sent the following text message to TURNER:  
"OMW to work. J.E. has red marks on his nose and cheek."

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd October 2020

JUDGE DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form C93 (1-10-05)
Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale TURNER

SEX: Male
RACE: Black
DATE OF BIRTH: 5/23/1992
HEIGHT: 5'7
WEIGHT: 185
EYES: Brown
HAIR: Black
COMB: Unknown
SCARS, MARKS, TATTOOS:

DEFENDANT'S HOME ADDRESS:
LKA 915 Division Ave NE, W, Washington, DC 20019

COMPLAINANT'S NAME: G.L.

LOCATION OF OFFENSE:
915 Division Ave NE, #5, Washington, DC 20019
DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:25 a.m.

CAUTION AND MEDICAL CONDITIONS (CMC): Select a valid CMC code below for wanted persons when using the caution indicator.

- 69 = Armed and Dangerous
- 65 = Visible Firearms
- 80 = Previously Violent Offender
- 10 = Misdemeanor
- 15 = Explosive Substance
- 12 = Offensive Substance
- 19 = Mental Illness
- 25 = Escape Risk
- 18 = Escaped
- 30 = Suspect
- 31 = Othar
- 32 = Other

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

TURNER responded:
"I don't know about the marks I only know about the chest because I seen weight but I told him put it down [M.E] was right there before I left out and said [M.E] pls get the weight we was working out a lil I had full control over all of the kids in the house see nothing happened to G.E."

JASON responded:
"I'm just telling u what I saw u a nigga, It's my stabitute.

TURNER responded:
"Ok you right."

On December 19, 2019, MPD interviewed 11-year-old M.E. who stated that he had played with his brother the night before the incident, but did not see any injuries. He did not see how G.E.'s ears were injured. M.E. stated that G.E. and I.E. (his 3 year-old brother) always play rough in the house. Detective Blake asked M.E. what happened in the house when they get in trouble, he stated that his mother scolds them to their room. M.E. said his mother never uses physical discipline with them. M.E. stated that he felt safe at home with his family.

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antouna Dale Turner

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd DAY OF OCTOBER 2020

JUDGE
DEPUTY CLERK
SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 10-29-2020
**Exhibit D p. 033**

### Superior Court of the District of Columbia

**Criminal Division**

**AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**

<table>
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<th>DEFENDANT'S NAME:</th>
<th>Antonio Dale TURNER</th>
</tr>
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<tr>
<td>SEX:</td>
<td>Male</td>
</tr>
<tr>
<td>RG NO.:</td>
<td>523/1992</td>
</tr>
<tr>
<td>DOB:</td>
<td>5/23/1992</td>
</tr>
<tr>
<td>HEIGHT:</td>
<td>5'7&quot;</td>
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<tr>
<td>WT:</td>
<td>185</td>
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<tr>
<td>EYES:</td>
<td>Brown</td>
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<tr>
<td>HAIR:</td>
<td>Black</td>
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<td>Dark</td>
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<tr>
<td>SCARS, MARKS, TATTOOS:</td>
<td>Unknown</td>
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<tr>
<td>DEFENDANT'S HOME ADDRESS:</td>
<td>1403 935 Division Ave N, 16 Washington, DC 20019</td>
</tr>
<tr>
<td>TELEPHONE NUMBER:</td>
<td>(202) 347-1163</td>
</tr>
</tbody>
</table>

### COMPLAINANT'S NAME:

**G.E.**

**LOCATION OF OFFENSE:**

935 Division Ave N, #5 Washington, D.C. 20019

**DATE OF OFFENSE:**

April 1, 2020

**TIME OF OFFENSE:**

8:15 hours

### CAUTIOUS AND MEDICAL CONDITIONS (CMC)

Select a valid CMC code below for a listed person when using the caution indication:

- 00 = Armed and Dangerous
- 21 = Escape Risk
- 28 = Sexually Violent Predator
- 10 = Marital Assault
- 30 = Riot Condition
- 15 = Expensive Expertise

**GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:**

70. Since G.E. was too small and non-verbal to interview, Investigator Blake determined there was not enough evidence to prove or disprove the allegation.

71. On January 16, 2020, MPD VIIND ruled the investigation as unfounded and it was closed in early March 2020.

72. On January 28, 2020, TURNER called 911 and G.E. was taken to CNMC with a severe laceration to G.E.'s forehead. TURNER claimed that G.E. fell off the bed. While later reviewing TURNER's phone, your affiant observed a photograph of G.E. on a text thread between TURNER and EASON, dated January 28, 2020, from Children's National Health System; the photo shows the decedent with a severe laceration to his forehead. At the same time, EASON sent TURNER the following text:

> "I'm never leaving him with [ME] again."

**TURNER** responded:

> "Yeah but it's not his fault he just not watching them like he supposed to."

73. Subsequently, upon review of the CNMC medical records, on January 28, 2020, when TURNER called 911 and G.E. was taken to the hospital, the records indicate the following information from the examination and

### AFFIDANT'S SIGNATURE:

x Anthony D. Greene

---

**TO: WARRANT CLERK**

Pleasing ISSUE A WARRANT FOR:

Antonio Dale Turner

Charged with:

First Degree Murder

Failure to Provide Child Support

[Assistant United States Attorney]

NYC APPROVED —

22nd October 2020

**SUBSCRIBED AND SWORN BEFORE ME THIS**

[Judge's Signature]

[Deputy Clerk's Signature]

Superior Court of the District of Columbia
Exhibit D p. 034

Superior Court of the District of Columbia
Criminal Division

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale Turner

SEX: Male
RACE: Black
DOB: 5/22/1992
HEIGHT: 5'7
WEIGHT: 185
EYES: Brown
HAIR: Black
COMPLEXION: Dark
SCARS, MARKS, TATTOOS: Unknown

DEFENDANT'S HOME ADDRESS:
LKA 925 Division Ave NE, 46 Washington, DC 20019

COMPLAINANT'S NAME:
G.E.

LOCATION OF OFFENSE:
335 Division Ave NE, 46 Washington, DC 20019

DATE OF OFFENSE:
April 1, 2020
TIME OF OFFENSE:
4:25 hours

CAUTION AND MEDICAL CONDITIONS (CMC)

Give a brief description of what happened:

Interview of TURNER:

G.E. suffered a complex 7cm jagged laceration with concern for a facial nerve laceration to his head and had a concussion. The records further indicated that TURNER said G.E. was taking a nap and asked the 11-year-old child [M.E.] to take care of the kids. He woke up to a thump and called out to his son, asking what happened. Child says that nothing happened. But then he [had] another bump in the room and went to bed yesterday. He saw his son holding G.E.'s head. Noticed that laceration and called 911. There was no reported loss of consciousness. He has been behaving normally since the incident. He has had no vomiting. There is no other trauma.

74. In February 2020, G.E. and I.E. did not attend their daycare center for most of the month. TURNER stated that it was for his wife to get the children to daycare because she was pregnant and he couldn't assist because he worked.

75. W-I reported that during early February 2020, II noticed that the decedent had not been attending the educational facility. W-I called FASON, inquiring about the status of the decedent. W-I reported that FASON said that the decedent had injured his head falling off a "bunk bed" and the doctor advised her that the decedent should not return to school until his injury had completely healed. [NOTE: The home did not have bunk beds.]

TO WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner

ASSISTANT UNITED STATES ATTORNEY

Future Reference Form CD-10055-2

FORM APPROVED:

Rev. Date: 11-06-06

SUBSCRIBED AND SIGNED BEFORE ME THIS
22nd Day of October 2020

JUDGE: Deputy Clerk: Superior Court of the District of Columbia

Resignation: 11-06-06

X Anthony D. Greene

Affiant's Signature:

[Signature]
### Exhibit D p. 035

#### Superior Court of the District of Columbia

**Criminal Division**

### Affidavit in Support of an Arrest Warrant

<table>
<thead>
<tr>
<th>Defendant's Name:</th>
<th>Antonio Dale Turner</th>
</tr>
</thead>
</table>

| Sex: Male | Race: Black | Date of Birth: 5/2/1992 | Height: 5'7 | Weight: 185 |

| Eye Color: Brown | Hair Color: Black | Complexion: Dark | Scars, Marks, Tattoos: Unknown |

**Address:**

105 Division Ave NE, #6 Washington, DC 20019

<table>
<thead>
<tr>
<th>Telephone Number:</th>
</tr>
</thead>
<tbody>
<tr>
<td>(202) 332-1666</td>
</tr>
</tbody>
</table>

**Complainant's Name:**

G.L.

<table>
<thead>
<tr>
<th>Location of Offense:</th>
</tr>
</thead>
<tbody>
<tr>
<td>951 Division Ave NE, #6 Washington, DC 20019</td>
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<table>
<thead>
<tr>
<th>Date of Offense:</th>
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<tbody>
<tr>
<td>April 1, 2020</td>
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</table>

<table>
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<tr>
<th>Bail of Offense:</th>
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<tbody>
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<td>$25,000</td>
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### Caution and Medical Conditions (CMC)

Select a valid CMC code below for arrested persons where using the caution indicator.

- 96 = Armed and Dangerous
- 65 = Violent Tendencies
- 60 = Sexual Violent Predator
- 70 = Sex Offender
- 67 = Medication Required
- 85 = Homosexual
- 71 = Known to abuse drugs

### Give a Brief Description of What Happened:

76. In March 2020, G.L. and L.E. did not attend their daycare center for the entire month. The school closed for a portion of the month because of COVID.

77. On March 7, 2020, P.A.S.O.N. sent the following text message to TURNER:

> "Whatever u did to this boy don't do that shit again. His eye is swollen shut."

**[Note: Your affiant believes this text message refers to TURNER hitting M.E. and causing his black eye.]

### Timeline of March 31, 2020

78. Based on the above information, as well as additional information obtained during the MPD investigation, a timeline of March 31, 2020 is provided in Appendix A.

#### Calls on April 1, 2020

79. Subsequently, during the course of the investigation, your affiant learned that on April 1, 2020, between 6:08 AM and 2:00 PM, 22nd October 2020,

### Affiant's Signature:

X. Anthony D. Greene

---

**TO: WARRANT CLERK**

**PLEASE ISSUE A WARRANT FOR:**

Antonio Dale Turner

**Charges:**

- Child Abuse
- Battery
- Molest of Child

**Assistant United States Attorney**

**JHP**

**SUBSCRIBED AND SWORN BEFORE ME THIS 22nd Day of October 2020**

**(Judicial Deputy Clerk) Superior Court of the District of Columbia**

**Revision Date: 02-25-06**
AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale TURNER
NICKNAME: None
ALIAS(es): None
CEN: 76-053439
PDID: 6038
SEX: Male
RACE: Black
DOB: 5/23/1992
HEIGHT: 5'11
WEIGHT: 185
EYES: Brown
HAIR: Black
COMPL: Dark
SCARS, MARKS, TATTOOS: Unknown
DEFENDANT'S HOME ADDRESS: 52 Division Ave NE, #6, Washington, DC 20019
TELEPHONE NUMBER: (202) 313-1666
COMPLAINANT'S NAME: G.B.
LOCATION OF OFFENSE: 523 Division Ave NE, #6, Washington, D.C. 20019
DATE OF OFFENSE: April 1, 2020
TIME OF OFFENSE: 8:25 a.m.
CAUTION AND MEDICAL CONDITIONS (CMC): Select a valid CMC code below for medical reasons when using the caution indicator:
00 = Normal
01 = Violent Tendencies
02 = Sexually Violent Predator
10 = Mental Illness
11 = Explosive Temper
12 = Drug and Alcohol
65 = Psychopathic
66 = Diabetic
67 = Allergic
68 = Unknown
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

a.m. and 8:24 a.m. (the time of the 911 call), there were thirteen (13) calls or attempted calls between EASON's phone number and TURNER's phone number. After the 911 call, there were eight (8) calls or attempted calls between the two numbers, up until 09:31:11 a.m. The timeline is provided in Appendix B.

SUMMARY

80. As indicated above, EASON and TURNER left the home, leaving the children in the care of an 11-year-old, M.E. Also, even when they were present, they frequently ordered the 11-year-old to tend to his two and three-year-old siblings. M.E. was ordered to cook, feed, and clean the house. M.E. was required to wake up in the middle of the night and change his sibling's diapers so as not to wake up EASON or TURNER.

81. In summary, the above information evidences how defendants EASON and TURNER collectively and chronically inflicted injury upon the three children who lived with them, including two-year-old G.E., who died at their hands. Through their actions and inaction, in situations where they knew or should have known that the two-year-old decedent (G.E.), as well as three-year-old G.E., required immediate medical attention, yet they failed to call for medical assistance until after G.E. was found dead on April 1, 2020. Throughout the past year, each of the three children were abused, eventually leading to G.E.'s death. In the last day of G.E.'s life, neither parent sought medical treatment for him or his injured brother, who suffered very similar and serious injuries which required medical treatment.

AFFIANT'S SIGNATURE: X Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Antonio Dale Turner
Charge: First-Degree Murder Family Member (Child - 2)
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS 22nd October 2020
(JUDGE) DEPUTY CLERK, SUPERIOR COURT OF THE DISTRICT OF COLUMBIA
Revised Date: 11-33-05
Superior Court of the District of Columbia
CRIMINAL DIVISION

Exhibit D p. 037

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DEFENDANT'S NAME: Antonio Dale TURNER

SEX: Male
RACE: Black
DOB: 5/23/1992
HGT: 5'7
WT: 183
EYES: Brown
HAIR: Dark
COMPL: Unknown
SCARS, MARKS, TATTOOS:

DEFENDANT'S HOME ADDRESS:
LKA: 915 Division Ave NE #6
Washington, DC 20019

TELEPHONE NUMBER:
(202) 332-1463

COMPLAINT'S NAME:
G.L.

LOCATION OF OFFENSE:
535 Division Ave NE #6
Washington, DC 20019

DATE OF OFFENSE:
April 1, 2020

TIME OF OFFENSE:
8:25 AM

GATFINS AND MEDICAL CONDITIONS (GMC)

GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

Attention. Based on the above, both defendants are being charged with First Degree Cruelty to Children and Felony Murder.

82. Based on the above and the facts and circumstances gathered through the course of this investigation, your Affiant submits that probable cause exists to believe that Antonio Dale TURNER (DOB: 05/23/1992, 19311 6/96 380) committed the criminal offenses of First Degree Cruelty to Children and Felony Murder, in the District of Columbia, and request that warrants be issued for their arrest.

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charges: First Degree Cruelty to Children, Felony Murder

ASSISTANT UNITED STATES ATTORNEY

AFFIDAVIT'S SIGNATURE:

x Anthony D. Greene

22nd October 20
### APPENDIX A

| March 31, 2020 |  
|----------------|---------------- |
| **7:15 a.m.**  | EASON said they left the house at 7:15 a.m. because her pregnancy checkup appointment was at 8:00 a.m. EASON said she drove, but then corrected herself and said her husband drove; she also claimed a cousin came to pick her up. |
| **7:20-7:30 a.m.** | TURNER and EASON left apartment for ultrasound appointment. |
| **8:30-9:00 a.m.** | In TURNER's first interview, he claimed they left for hospital at 8:30 – 9:00 a.m. |
| **8:30-9:00 a.m.** | Ultrasound appointment at GW hospital. They were told to stay longer because of a blood pressure issue with EASON and the possibility of EASON being admitted to induce her baby. |
| **10:00-11:00 a.m.** | TURNER or EASON received a call from a private number. TURNER or EASON called back but no response. This is a call from a computer, so they assume it is from one of the kids. |
| **10:00-11:00 a.m.** | EASON stated that while she was the hospital, TURNER left the hospital and went to the store, then home. EASON said she called TURNER while he was at the house and told him they were letting her go from the hospital. EASON claimed that after they left hospital, they went straight back home. |
| **12:30 p.m.** | TURNER claimed M.E.'s phone was not working, so TURNER went home; said he saw G.E. trying to get to his weight bar, so he "popped" G.E. on the hand and took him to a room. TURNER heard I.E. running around, then saw I.E. with a "boo-boo" on his head and he was fine. TURNER punched and kicked M.E.; asked him "what the F--" he was doing. |
| **12:30 p.m.** | Because of the prolonged monitoring at the hospital, TURNER left to pick up food at Walmart for the kids. He arrived at the apartment to deliver the food and pick up medication at 12:30 p.m. [NOTE: this differs from his first interview]. |
| **12:30 p.m.** | TURNER stated that he walked into apartment and saw kids playing with workout equipment and the apartment in disarray. He admitted he hit both M.E. and G.E. |

**Around lunch time**

| **Around lunch time** | M.E. said TURNER came home for three minutes. |

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*Anthony D. Greene*
<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>12:40 p.m.</td>
<td>TURNER left apartment within 7-10 minutes of arriving. He went back to hospital to pick up</td>
</tr>
<tr>
<td></td>
<td>EASON and then both return to the apartment.</td>
</tr>
</tbody>
</table>
|              | EASON stated she came home from her appointment at about 1:00 or 2:00.  
[NOTE – text messages do NOT corroborate this. She was still at GW hospital at 2:50 p.m.] |
| 1:00 p.m.    | EASON claimed her husband and oldest son, M.E., were at home babysitting G.E. and T.E. She  |
|              | claimed they left the kids at home because of Coronavirus.                                  |
| 1:30 or 2:00 p.m. | M.E. said dad came in, gave him the phone, and Mom asked (over the phone) where are the   |
|              | Tums? M.E. said they are on her dresser, he got them and gave them to dad, and he left     |
|              | back out.                                                                                  |
| 2:30 p.m.    | TURNER claimed that he and EASON arrived back from the hospital at 2:30 p.m. TURNER         |
|              | confirmed the time they were away from the apartment was from 8:30 a.m. - 2:30 p.m.        |
| 2:56:40 p.m. | Text message from TURNER to EASON stating I'm waiting for you                              |
| 2:56:43 p.m. | TURNER texted "I'm outside"                                                                  |
|              | TURNER stated they stopped at Walmart to get food.                                          |
|              | TURNER stated he went to Walmart on H Street.                                              |
|              | According to Google Maps, it takes 26 minutes to drive from GW Hospital to 935 Division    |
|              | Avenue, Northeast.                                                                        |
|              | M.E. stated that TURNER came in to get Tums and he looked outside and saw Mom and Dad      |
|              | sitting in the car.                                                                        |
|              | EASON admitted that when they get home, she stayed in the car to catch her breath.         |
|              | [NOTE: M.E. said that his mother stayed in the car when they came home.]                   |
|              | Once EASON and TURNER arrived home, it does not appear they again left the apartment on    |
|              | March 31.                                                                                 |
| 5:00 p.m.    | TURNER claimed he came home around 5:00 p.m. from wife's hospital visit to get his         |
|              | "medicine" or marijuana for his ADHD and got EASON some Tums.                             |
|              | TURNER stated when they got home, the kids were fine.                                      |
|              | EASON claimed she came in the house and went to sleep until 6:00 and that M.E. brought    |
|              | her chicken nuggets because she did not want pizza. She layed back down.                   |
|              | M.E. remembered TURNER brought pizza home and then returning 30 to 45 minutes later.       |
|              | TURNER stated G.E. was up because he popped him.                                           |
| 2:30–6:00 p.m.| TURNER stated G.E. was asleep when TURNER and EASON arrived back and that G.E. woke up     |
|              | around 6:00 p.m.                                                                          |
| 6:00–7:00/7:30 p.m. | M.E. said he heated pizza in oven at 6:00 p.m. TURNER told M.E. to                        |
|              | wake up G.E. to eat at 7:00/7:30 p.m.                                                    |

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Anthony D. Greene

[Signature]
**APPENDIX A**

<table>
<thead>
<tr>
<th>Time</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>7:00 p.m.</td>
<td>TURNER stated G.E. did not want to eat pizza, but did eat apple sauce. I.E. ate one slice of pizza.</td>
</tr>
<tr>
<td>7:00 p.m.</td>
<td>TURNER laid down; told M.E. to feed pizza to boys; TURNER walked to children’s room and saw G.E. was on tablet. TURNER claimed that I.E. looked hurt and I.E. said nothing was wrong and then “high fived” TURNER. TURNER said he gave both G.E. and I.E. a tablet and he went to bed.</td>
</tr>
<tr>
<td></td>
<td>EASON stated Dad fed G.E. pizza.</td>
</tr>
<tr>
<td>7:00 p.m.</td>
<td>EASON said she came home and went to bed; checked on G.E. and I.E. at 10:30 p.m. and both children were on their tablets and watching TV and appeared fine. [NOTE: Dr. Artis, an expert in Child Abuse, stated that the injuries to the children would have been obvious and they would have been manifesting symptoms from the damaged liver and kidneys.]</td>
</tr>
<tr>
<td>7:00 p.m.</td>
<td>TURNER stated that at 7:00 p.m., he did not hear from the boys. He was in the bedroom laying down and his wife was sleeping. TURNER asked M.E. if he made pizza to give to the kids. M.E. said yes. TURNER said he checked on G.E. and I.E. at around 7:30 p.m. or 8:00 p.m. and claimed they were in their bedrooms and doing fine. [NOTE: Dr. Artis stated that the child's injuries would have been obvious and neither would have been acting or walking normally on the evening of March 31, 2020.]</td>
</tr>
<tr>
<td></td>
<td>TURNER said he heard G.E. crying but he did not check on him because he knew he was okay.</td>
</tr>
<tr>
<td>around 7:30 p.m.</td>
<td>M.E. said she made I.E. and G.E. pizza and they looked fine, Mom was asleep. G.E. and I.E. “looked normal.”</td>
</tr>
<tr>
<td>8:30 p.m.</td>
<td>TURNER stated he fed the kids around 7:30 p.m. and checked on them, and claimed they were good. TURNER admitted using marijuana at the time. He heard G.E. crying for something but admitted he did not check on him.</td>
</tr>
<tr>
<td>9:00-9:30 p.m.</td>
<td>TURNER went to bed at 9:00 or 9:30 p.m.</td>
</tr>
<tr>
<td>10:00 p.m.</td>
<td>EASON said she woke up at approximately 10:00 p.m. and her husband had fed the kids and they were playing, watching TV.</td>
</tr>
<tr>
<td>10:30 p.m.</td>
<td>TURNER claimed his wife got up and took over at 10:30 p.m., because he had to work the next day.</td>
</tr>
<tr>
<td></td>
<td>EASON stated that she got up and checked on the kids. The kids were still up, playing with the tablets and watching TV in their bedroom. M.E. was watching TV in the living room. EASON went back to bed and heard G.E. whining like his tablet died but EASON went to sleep. TURNER was in bed.</td>
</tr>
</tbody>
</table>

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Anthony D. Greene

10/17/20
### APPENDIX B

**Calls on April 1, 2020**

<table>
<thead>
<tr>
<th>April 1, 2020</th>
<th>To/From</th>
<th>Duration</th>
</tr>
</thead>
<tbody>
<tr>
<td>06:08:57am</td>
<td>TURNER to EASON</td>
<td>01:57</td>
</tr>
<tr>
<td>06:11:42am</td>
<td>TURNER to EASON</td>
<td>00:10</td>
</tr>
<tr>
<td>06:42:28am</td>
<td>TURNER to EASON</td>
<td>15:47</td>
</tr>
<tr>
<td>07:16:25am</td>
<td>TURNER to EASON</td>
<td>00:22</td>
</tr>
<tr>
<td>07:51:49am</td>
<td>TURNER to EASON</td>
<td>Not answered</td>
</tr>
<tr>
<td>07:52:01am</td>
<td>EASON to TURNER</td>
<td>00:16</td>
</tr>
<tr>
<td>08:23:08am</td>
<td>EASON to TURNER</td>
<td>Not answered</td>
</tr>
<tr>
<td>08:23:18am</td>
<td>EASON to TURNER</td>
<td>Not answered</td>
</tr>
<tr>
<td>08:23:37am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
</tr>
<tr>
<td>08:23:43am</td>
<td>TURNER to EASON</td>
<td>00:04</td>
</tr>
<tr>
<td>08:23:50am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
</tr>
<tr>
<td>08:24:04am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
</tr>
<tr>
<td>08:24:11am</td>
<td>TURNER to EASON</td>
<td>00:03</td>
</tr>
</tbody>
</table>

**911 call made at 08:24:11am**

| 08:26:07am   | TURNER to EASON  | 00:03        |
| 08:26:40am   | TURNER to EASON  | 00:04        |
| 08:32:50am   | EASON to TURNER  | 06:05        |
| 08:53:34am   | EASON to TURNER  | 00:18        |
| 08:54:18am   | TURNER to EASON  | 00:57        |
| 09:16:17am   | EASON to TURNER  | 00:12        |
| 09:31:05am   | EASON to TURNER  | 00:00        |
| 09:31:11am   | TURNER to EASON  | 00:04        |

10/17/20