



DC KinCare Alliance
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Washington, DC 20036
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**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 through 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 causes 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)³, 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.

³ **§ 22A-2502. Criminal neglect of a minor.**

(a) *First degree*. An actor commits first degree criminal neglect 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) Created, or failed to mitigate or remedy, a substantial risk that the complainant would experience serious bodily injury or death.

(b) *Second degree*. An actor commits second degree criminal neglect 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) Created, or failed to mitigate or remedy, a substantial risk that the complainant would experience:

(A) Significant bodily injury; or

(B) Serious mental injury.

(c) *Third degree*. An actor commits third degree criminal neglect 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) Engages in one of the following:

(A) Knowingly leaves the complainant in any place with intent to abandon the complainant; or

(B) Recklessly:

(i) Fails to make a reasonable effort to provide food, clothing, shelter, supervision, medical services, medicine, or other items or care essential for the physical health, mental health, or safety of the complainant; or

(ii) Creates, or fails to mitigate or remedy, a substantial risk that the complainant would experience bodily injury from consumption of alcohol, or consumption or inhalation, without a valid prescription, of a controlled substance or marijuana.

(d) *Exclusions from liability*.

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. Menniefeld broke L.D.'s jaw, her ribs, and caused internal injuries to her organs. (See Exhibit A attached.) Then, Mr. Menniefeld 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. Menniefeld 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. Menniefeld 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 NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181563	FDID: DC 586071																				
SEX: M	RACE: Black	DOB: 02/06/92	HGT: 5'8"	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: (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 23, 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.																													
<table border="0"> <tr> <td><input type="checkbox"/> 60 - Armed and Dangerous</td> <td><input type="checkbox"/> 85 - Hemophiliac</td> <td><input type="checkbox"/> 55 - Alcoholism</td> <td><input type="checkbox"/> 01 - Other</td> <td><input type="checkbox"/> 70 - Seizures</td> </tr> <tr> <td><input type="checkbox"/> 05 - Violent Tendencies</td> <td><input type="checkbox"/> 90 - Diabetic</td> <td><input type="checkbox"/> 60 - Allergies</td> <td><input type="checkbox"/> 65 - Epilepsy</td> <td><input type="checkbox"/> 80 - Medication Required</td> </tr> <tr> <td><input type="checkbox"/> 08 - Mental Arts Expert</td> <td><input type="checkbox"/> 50 - Heart Condition</td> <td><input type="checkbox"/> 20 - Known to abuse drugs</td> <td><input type="checkbox"/> 25 - Escape Risk</td> <td><input type="checkbox"/> 05 - Explosive Expertise</td> </tr> <tr> <td><input type="checkbox"/> 30 - Sexually Violent Predator</td> <td></td> <td></td> <td></td> <td></td> </tr> </table>										<input type="checkbox"/> 60 - Armed and Dangerous	<input type="checkbox"/> 85 - Hemophiliac	<input type="checkbox"/> 55 - Alcoholism	<input type="checkbox"/> 01 - Other	<input type="checkbox"/> 70 - Seizures	<input type="checkbox"/> 05 - Violent Tendencies	<input type="checkbox"/> 90 - Diabetic	<input type="checkbox"/> 60 - Allergies	<input type="checkbox"/> 65 - Epilepsy	<input type="checkbox"/> 80 - Medication Required	<input type="checkbox"/> 08 - Mental Arts Expert	<input type="checkbox"/> 50 - Heart Condition	<input type="checkbox"/> 20 - Known to abuse drugs	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 05 - Explosive Expertise	<input type="checkbox"/> 30 - Sexually Violent Predator				
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<input type="checkbox"/> 30 - Sexually Violent Predator																													
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																													

POLICE REPORT

On December 23, 2020, at approximately 11:35AM, 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 (CFSA) 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 CFSA hotline.

The first allegation was called in at 11:18PM on December 22, 2020. Reporting Party One (RP-1) stated that the Complainant's mother beats her six (6) children on a regular basis. RP-1 advised that the Complainant's mother also beats Suspect Maurice Meniefield. RP-1 stated that one of the children called her and informed her that Suspect Maurice Meniefield had beaten C-1's mother and when she ran away from him, she was hit by a car. RP-1 advised that this child stated he/she was scared because Suspect Maurice Meniefield had also beaten the Complainant. RP-1 advised that the Complainant's mother was at the hospital when Suspect Maurice Meniefield took the Complainant and left her at an unknown location. Suspect Maurice Meniefield 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 Meniefield's child.

AFFIANT'S SIGNATURE:

[Signature]
D2-1563

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 *[Signature]* 2020

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

Exhibit A p. 002

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	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: (620) 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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.									
<input type="checkbox"/> 00 = Armed and Dangerous <input type="checkbox"/> 85 = Homicidal <input type="checkbox"/> 55 = Alcoholic <input type="checkbox"/> 01 = Other <input type="checkbox"/> 70 = Suicidal <input type="checkbox"/> 05 = Violent Tendencies <input type="checkbox"/> 90 = Diabetic <input type="checkbox"/> 60 = Allergies <input type="checkbox"/> 55 = Epilepsy <input type="checkbox"/> 80 = Medication Required <input type="checkbox"/> 10 = Martial Arts Expert <input type="checkbox"/> 50 = Heart Condition <input type="checkbox"/> 20 = Knows to abuse drugs <input type="checkbox"/> 25 = Escape Risk <input type="checkbox"/> 15 = Explosive Expertise <input type="checkbox"/> 30 = Sexually Violent Predator									
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 in 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 (a 2 year old female) was with a different father. The Complainant's

AFFIANT'S SIGNATURE:



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 **24**

DAY OF **Dec** 2020

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

Exhibit A p. 003

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo				ALIASES: N/A		CCN: 20-181568	PDID: DC 586071
SEX: M	RACE: Black	DOB: 02/06/92	HGT: 5'0"	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: (620) 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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.											
<input type="checkbox"/> 01 - Armed and Dangerous <input type="checkbox"/> 85 - Homophobic <input type="checkbox"/> 55 - Alcoholic <input type="checkbox"/> 81 - Other <input type="checkbox"/> 70 - Suicidal <input type="checkbox"/> 85 - Violent Tendencies <input type="checkbox"/> 90 - Diabetic <input type="checkbox"/> 60 - Allergies <input type="checkbox"/> 65 - Epilepsy <input type="checkbox"/> 80 - Medication Required <input type="checkbox"/> 10 - Martial Arts Expert <input type="checkbox"/> 50 - Heart Condition <input type="checkbox"/> 20 - Known to abuse drugs <input type="checkbox"/> 25 - Escape Risk <input type="checkbox"/> 15 - Explosive Expertise <input type="checkbox"/> 30 - Sexually Violent Predator											
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 Meniefield. 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.

AFFIANT'S SIGNATURE:

X 

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

DAY OF  2020

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

Exhibit A p. 004

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

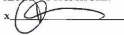
USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	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: (620) 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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.									
<input type="checkbox"/> 00 - Armed and Dangerous <input type="checkbox"/> 55 - Hemophilia <input type="checkbox"/> 55 - Alcohol <input type="checkbox"/> 01 - Other <input type="checkbox"/> 70 - Suicidal <input type="checkbox"/> 05 - Violent Tendencies <input type="checkbox"/> 90 - Diabetic <input type="checkbox"/> 60 - Allergies <input type="checkbox"/> 65 - Epilepsy <input type="checkbox"/> 80 - Medication Required <input type="checkbox"/> 10 - Martial Arts Expert <input type="checkbox"/> 50 - Heart Condition <input type="checkbox"/> 20 - Known to abuse drugs <input type="checkbox"/> 25 - Escape Risk <input type="checkbox"/> 15 - Explosive Expertise <input type="checkbox"/> 30 - Sexually Violent Predator									
GIVE 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.

AFFIANT'S SIGNATURE:

x 

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

DAY OF August, 2020

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

Exhibit A p. 005

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW N.O.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	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: (620) 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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.									
<input type="checkbox"/> 00 - Armed and Dangerous <input type="checkbox"/> 85 - Hemophilic <input type="checkbox"/> 55 - Alcoholic <input type="checkbox"/> 01 - Other <input type="checkbox"/> 70 - Suicidal <input type="checkbox"/> 05 - Violent Tendencies <input type="checkbox"/> 90 - Diabetic <input type="checkbox"/> 60 - Allergies <input type="checkbox"/> 65 - Epilepsy <input type="checkbox"/> 80 - Medication Required <input type="checkbox"/> 10 - Martial Arts Expert <input type="checkbox"/> 50 - Heart Condition <input type="checkbox"/> 20 - Known to abuse drugs <input type="checkbox"/> 15 - Escape Risk <input type="checkbox"/> 15 - Explosive Expertise <input type="checkbox"/> 30 - Sexually Violent Predator									
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:									

The Complainant's mother advised that her siblings, two brothers and a sister, often "mess" with her and she thinks one of them called in the report because they came over last night, December 22nd, 2020, to fight her because they do not like the man she is dating. The Complainant's mother advised that one of her brothers was arrested for assault (CCNs: 20-181253) and later in the evening, she made a "Destruction of Property" report against her sister (CCNs: 20-181268). The Complainant's mother advised that her siblings came to her house and physically assaulted her and then kicked in her rear door.

The Complainant's mother stated MPD Officers also came and checked on her children and they were fine (CCNs: 20-181286).

The Complainant's mother was advised that if she did not provide any identifying information as to where the Complainant was, her remaining four (4) children were going to be removed from her home by CFSA. The Complainant's mother did not provide any further information. The Social Worker noted there were multiple presents under the Christmas tree from "Mo."

AFFIANT'S SIGNATURE:

X 

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 **24**

DAY OF  2020

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

Exhibit A p. 006

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

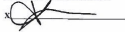
DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	PDID: DC 586071																				
SEX: M	RACE: Black	DOB: 02/06/92	HGT: 6'0"	WGT: 160	EYES: BRO	HAIR: Brown	COMPL: Medium	SCARS, MARKS, TATTOOS N/A																					
DEFENDANT'S HOME ADDRESS: 517 Harvard Street, NW, #A, Washington, D.C., 20001						TELEPHONE NUMBER: (670) 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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.																													
<table border="0"> <tr> <td><input type="checkbox"/> 00 - Armed and Dangerous</td> <td><input type="checkbox"/> 85 - Homicidal</td> <td><input type="checkbox"/> 55 - Alcoholic</td> <td><input type="checkbox"/> 01 - Other</td> <td><input type="checkbox"/> 70 - Suicidal</td> </tr> <tr> <td><input type="checkbox"/> 45 - Violent Tendencies</td> <td><input type="checkbox"/> 90 - Diabetic</td> <td><input type="checkbox"/> 60 - Allergies</td> <td><input type="checkbox"/> 65 - Epilepsy</td> <td><input type="checkbox"/> 95 - Medication Required</td> </tr> <tr> <td><input type="checkbox"/> 10 - Martial Arts Expert</td> <td><input type="checkbox"/> 50 - Heart Condition</td> <td><input type="checkbox"/> 20 - Known to abuse drugs</td> <td><input type="checkbox"/> 25 - Escape Risk</td> <td><input type="checkbox"/> 15 - Explosive Expertise</td> </tr> <tr> <td><input type="checkbox"/> 30 - Sexually Violent Predator</td> <td></td> <td></td> <td></td> <td></td> </tr> </table>										<input type="checkbox"/> 00 - Armed and Dangerous	<input type="checkbox"/> 85 - Homicidal	<input type="checkbox"/> 55 - Alcoholic	<input type="checkbox"/> 01 - Other	<input type="checkbox"/> 70 - Suicidal	<input type="checkbox"/> 45 - Violent Tendencies	<input type="checkbox"/> 90 - Diabetic	<input type="checkbox"/> 60 - Allergies	<input type="checkbox"/> 65 - Epilepsy	<input type="checkbox"/> 95 - Medication Required	<input type="checkbox"/> 10 - Martial Arts Expert	<input type="checkbox"/> 50 - Heart Condition	<input type="checkbox"/> 20 - Known to abuse drugs	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 15 - Explosive Expertise	<input type="checkbox"/> 30 - Sexually Violent Predator				
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<input type="checkbox"/> 30 - Sexually Violent Predator																													
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																													

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 Meniefield's father. This was also confirmed through previous reports with CFSA.

AFFIANT'S SIGNATURE:



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

DAY OF December 2020

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

Exhibit A p. 007

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICK NAME: Mo		ALIASES: N/A		CCN: 20-181568	POID: 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: (620) 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 (CMC) Select a valid CMC code below for wanted persons when using the caution indicator.									
<input type="checkbox"/> 08 - Armed and Dangerous <input type="checkbox"/> 85 - Homophobic <input type="checkbox"/> 88 - Alcoholic <input type="checkbox"/> 01 - Other <input type="checkbox"/> 70 - Suicidal <input type="checkbox"/> 45 - Violent Tendencies <input type="checkbox"/> 90 - Diabetic <input type="checkbox"/> 60 - Allergies <input type="checkbox"/> 45 - Epilepsy <input type="checkbox"/> 80 - Medication Required <input type="checkbox"/> 10 - Mental Arms Expert <input type="checkbox"/> 50 - Heart Condition <input type="checkbox"/> 20 - Known to abuse drugs <input type="checkbox"/> 35 - Escape Risk <input type="checkbox"/> 15 - Explosive Expertise <input type="checkbox"/> 30 - Sexually Violent Predator									
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:									

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 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 Meniefield 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

AFFIANT'S SIGNATURE:

X. 

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 **24**

DAY OF **Dec** 2020

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

Exhibit A p. 008

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181565		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: (620) 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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.											
<input type="checkbox"/> 60 = Armed and Dangerous <input type="checkbox"/> 85 = Hemophilic <input type="checkbox"/> 55 = Alcoholic <input type="checkbox"/> 01 = Other <input type="checkbox"/> 70 = Suicidal <input type="checkbox"/> 65 = Violent Tendencies <input type="checkbox"/> 90 = Diabetic <input type="checkbox"/> 68 = Allergies <input type="checkbox"/> 65 = Epilepsy <input type="checkbox"/> 80 = Medication Required <input type="checkbox"/> 10 = Martial Arts Expert <input type="checkbox"/> 50 = Heart Condition <input type="checkbox"/> 20 = Known to abuse drugs <input type="checkbox"/> 25 = Escape Risk <input type="checkbox"/> 15 = Explosive Expertise <input type="checkbox"/> 30 = Sexually Violent Predator											
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:											

Suspect Maurice Meniefield 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 Meniefield threw the cart at his mother's head, striking her. W-1 then stated Suspect Maurice Meniefield struck his mother in the head with a metal sauce pan. W-1 stated Suspect Maurice Meniefield locked his mother in the backyard and then came inside the house and punched the Complainant in the abdomen and told all the children 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 Meniefield was possibly at 1215 49th Street.

AFFIANT'S SIGNATURE:

x 

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 **24**

DAY OF **Decal** 2020

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

Exhibit A p. 009

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	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: (620) 474-5560		
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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.									
<input type="checkbox"/> 00 = Armed and Dangerous <input type="checkbox"/> 85 = Hemophilia <input type="checkbox"/> 55 = Alcoholic <input type="checkbox"/> 01 = Other <input type="checkbox"/> 70 = Suicidal <input type="checkbox"/> 05 = Violent Tendencies <input type="checkbox"/> 90 = Diabetic <input type="checkbox"/> 40 = Allergies <input type="checkbox"/> 65 = Epilepsy <input type="checkbox"/> 80 = Medication Required <input type="checkbox"/> 10 = Martial Arts Expert <input type="checkbox"/> 50 = Heart Condition <input type="checkbox"/> 20 = Known to abuse drugs <input type="checkbox"/> 15 = Escape Risk <input type="checkbox"/> 15 = Explosive Expertise <input type="checkbox"/> 30 = Sexually Violent Predator									
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, 6th 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

AFFIANT'S SIGNATURE:

X 

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 **24**

DAY OF **December** 2020

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

Exhibit A p. 010

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEPENDANT'S NAME: Meniefield, Maurice				NICKNAME: Me		ALIASES: N/A		CCN: 20-181568		PDID: DC 586071	
SEX: M	RACE: Black	DOB: 02/06/92	HGT: 6'0"	WGT: 160	EYES: BRO	HAIR: Brows	COMPL: Medium	SCARS, MARKS, TATTOOS N/A			
DEPENDANT'S HOME ADDRESS: 517 Harvard Street, NW, #A, Washington, D.C., 20001							TELEPHONE NUMBER: (620) 474-5840				
DEPENDANT'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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.											
<input type="checkbox"/> 01 - Armed and Dangerous <input type="checkbox"/> 05 - Menopausal <input type="checkbox"/> 25 - Alcohol <input type="checkbox"/> 81 - Other <input type="checkbox"/> 70 - Seizure <input type="checkbox"/> 05 - Violent Tendencies <input type="checkbox"/> 99 - Diabetic <input type="checkbox"/> 60 - Allergies <input type="checkbox"/> 65 - Epilepsy <input type="checkbox"/> 80 - Medication Required <input type="checkbox"/> 10 - Martial Arts Expert <input type="checkbox"/> 58 - Heart Condition <input type="checkbox"/> 30 - Known to abuse drugs <input type="checkbox"/> 25 - Escape Risk <input type="checkbox"/> 15 - Explosive Expertise <input type="checkbox"/> 30 - Sexually Violent Predator											
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. Det. 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 QUANICE MENIEFIELD

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

AFFIANT'S SIGNATURE:

x 

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 **24**

DAY OF  2020

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

Exhibit A p. 011

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW N.O.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181368		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: (620) 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 (CMC) Select a valid CMC code below for wanted persons when using the caution indicator.											
<input type="checkbox"/> 00 - Armed and Dangerous <input type="checkbox"/> 05 - Hemophiliac <input type="checkbox"/> 55 - Alcoholic <input type="checkbox"/> 61 - Other <input type="checkbox"/> 70 - Suicidal <input type="checkbox"/> 05 - Violent Tendencies <input type="checkbox"/> 90 - Diabetic <input type="checkbox"/> 80 - Allergies <input type="checkbox"/> 65 - Epilepsy <input type="checkbox"/> 85 - Medication Required <input type="checkbox"/> 10 - Mental Arms Expert <input type="checkbox"/> 95 - Heart Condition <input type="checkbox"/> 30 - Known to abuse drugs <input type="checkbox"/> 25 - Escape Risk <input type="checkbox"/> 15 - Explosive Expertise <input type="checkbox"/> 30 - Sexually Violent Predator											
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:											

Quance Meniefield under arrest and 6th District Officers transported her to the 6th District station for processing. Defendant Quance Meniefield responded to United Medical Center for evaluation due to pregnancy concerns and then returned to the 6th District.

MEDICAL CONDITION OF COMPLAINANT

Your Affiant carried the Complainant out of the residence and it appeared the Complainant had not had her diaper changed in an appropriate amount of time. Your Affiant went with the Complainant in the ambulance to Children's National Hospital - Main Campus. During the ride, the Complainant was able to answer questions by nodding "yes" or "no." The Complainant was repeatedly touching her face and stomach. Your Affiant asked her if each part hurt, to which the Complainant nodded, "Yes." The Complainant touched her stomach again and Your Affiant asked her if she was hungry and the Complainant nodded, "yes." Your Affiant asked the Complainant if she had eaten anything today and she shook her head, "No."

The Complainant was admitted to Children's Hospital and considered an immediate trauma case. Multiple tests and scans were conducted. The Complainant's jaw was broken on both the left and right side of her face and it was advised that she required surgery on her face within the next day. The Complainant had rib fractures to both

AFFIANT'S SIGNATURE:

x 

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefield

Charge With: **First Degree Assault on Children**

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS **27**

DAY OF **Dec** 2020

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

Exhibit A p. 012

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

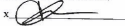
DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568		PDID: DC 586071																					
SEX: M	RACE: Black	DOB: 02/06/92	HGT: 6'0"	WGT: 160	EYES: BRO	HAIR: Brown	COMPL: Medium	SCARS, MARKS, TATTOOS N/A																							
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DEFENDANT'S BUSINESS ADDRESS: N/A							TELEPHONE NUMBER: N/A																								
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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.																															
<table border="0"> <tr> <td><input type="checkbox"/> 00 - Armed and Dangerous</td> <td><input type="checkbox"/> 55 - Hemophilia</td> <td><input type="checkbox"/> 55 - Alcohol</td> <td><input type="checkbox"/> 01 - Other</td> <td><input type="checkbox"/> 70 - Suicidal</td> </tr> <tr> <td><input type="checkbox"/> 05 - Violent Tendencies</td> <td><input type="checkbox"/> 90 - Diabetic</td> <td><input type="checkbox"/> 60 - Allergies</td> <td><input type="checkbox"/> 65 - Epilepsy</td> <td><input type="checkbox"/> 80 - Medication Required</td> </tr> <tr> <td><input type="checkbox"/> 10 - Martial Arts Expert</td> <td><input type="checkbox"/> 50 - Heart Condition</td> <td><input type="checkbox"/> 20 - Known to abuse drugs</td> <td><input type="checkbox"/> 25 - Escape Risk</td> <td><input type="checkbox"/> 15 - Explosive Expertise</td> </tr> <tr> <td><input type="checkbox"/> 30 - Sexually Violent Predator</td> <td></td> <td></td> <td></td> <td></td> </tr> </table>												<input type="checkbox"/> 00 - Armed and Dangerous	<input type="checkbox"/> 55 - Hemophilia	<input type="checkbox"/> 55 - Alcohol	<input type="checkbox"/> 01 - Other	<input type="checkbox"/> 70 - Suicidal	<input type="checkbox"/> 05 - Violent Tendencies	<input type="checkbox"/> 90 - Diabetic	<input type="checkbox"/> 60 - Allergies	<input type="checkbox"/> 65 - Epilepsy	<input type="checkbox"/> 80 - Medication Required	<input type="checkbox"/> 10 - Martial Arts Expert	<input type="checkbox"/> 50 - Heart Condition	<input type="checkbox"/> 20 - Known to abuse drugs	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 15 - Explosive Expertise	<input type="checkbox"/> 30 - Sexually Violent Predator				
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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 Quance 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.

AFFIANT'S SIGNATURE:

x 

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

DAY OF Sept 2020

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

Exhibit A p. 013

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT


USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	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: (620) 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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.																													
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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

AFFIANT'S SIGNATURE:

X. 

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

DAY OF December, 2020

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

Exhibit A p. 014

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	PD/D: 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: (620) 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 (CMC): Select a valid CMC code below for wanted person when using the caution indicator.																								
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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 sauce pan. 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

AFFIANT'S SIGNATURE:

X 

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

DAY OF December 2020

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

Exhibit A p. 015

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568		PDD: 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: (620) 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																						
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																															

really hurt. W-1 advised that the Complainant's mother called Defendant Quanice Meniefield 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 Meniefield, but in Virginia. W-1 stated that Suspect Maurice Meniefield 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 Meniefield 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 Meniefield 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 Meniefield 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 Meniefield 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 Meniefield. W-1 stated the abuse often occurs as Suspect Maurice Meniefield is just walking by one of the children and randomly decides to hit, punch, or kick them.

CUSTODIAL INTERVIEW WITH DEFENDANT QUANICE MENIEFIELD

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

AFFIANT'S SIGNATURE:

x

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefield

Charge With: First Degree Cruelty to Children

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBE AND SWORE BEFORE ME THIS

DAY OF Dec 2020

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

Exhibit A p. 016

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	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: (620) 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
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:									

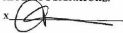
of Defendant Quanice Meniefield. Defendant Quanice Meniefield waived her rights and participated in an interview.

During the interview, Defendant Quanice Meniefield 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 Quanice Meniefield reported she was at the doctor's office for an appointment. Defendant Quanice Meniefield recanted that statement and reported her brother, who she identified as "Maurice," "Mo," brought the Complainant to her residence the previous day.

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

Defendant Quanice Meniefield reported Suspect Maurice Meniefield brought the Complainant to her and she

AFFIANT'S SIGNATURE:

x 

TO: WARRANT CLERK K

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefield

Charge With: **First Degree Cruelty to Children**

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS **24**

DAY OF **Dec** 2020

(JUDGE) **2020** (CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Exhibit A p. 017

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181563	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: (620) 474-5940																						
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																				
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																													

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

Defendant Quanice Meniefield said Suspect Maurice Meniefield returned to her residence the next morning and had asked about the Complainant's wellbeing. Defendant Quanice Meniefield reported while Suspect Maurice Meniefield 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 Meniefield reported she offered to bring the Complainant back home to her mother's care and the mother told her "no."

AFFIANT'S SIGNATURE:

X 

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 24

DAY OF December 2020

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

Exhibit A p. 018

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW N.O.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	POID: 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: (620) 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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.									
<input type="checkbox"/> 00 - Armed and Dangerous <input type="checkbox"/> 85 - Heterophilic <input type="checkbox"/> 55 - Alcoholic <input type="checkbox"/> 01 - Other <input type="checkbox"/> 70 - Suicidal <input type="checkbox"/> 85 - Violent Tendencies <input type="checkbox"/> 90 - Diabetic <input type="checkbox"/> 60 - Allergies <input type="checkbox"/> 65 - Epilepsy <input type="checkbox"/> 80 - Medication Required <input type="checkbox"/> 10 - Martial Arts Expert <input type="checkbox"/> 50 - Heart Condition <input type="checkbox"/> 20 - Known to abuse drugs <input type="checkbox"/> 25 - Escape Risk <input type="checkbox"/> 15 - Explosive Expertise <input type="checkbox"/> 30 - Sexually Violent Predator									
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:									

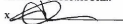
Defendant Quance Meniefield reported she didn't tell her children to hide with the Complainant under the bed. Defendant Quance Meniefield reported she was on her way home and her children called her via google duo and told her the Police were outside of the residence attempting to come in. Defendant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

Regarding previous abuse, Defendant Quance Meniefield 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 Meniefield 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.

AFFIANT'S SIGNATURE:

X 

TO: WARRANT CLERK K

PLEASE ISSUE A WARRANT FOR:

Maurice Meniefield

Charge With: **First Degree Cruelty to Children**

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS **24**

DAY OF  2020

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

Exhibit A p. 019

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Meniefield, Maurice				NICKNAME: Mo		ALIASES: N/A		CCN: 20-181568	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: (620) 474-5040		
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 (CMC) Select a valid CMC code below for wanted person when using the caution indicator.									
<input type="checkbox"/> 00 - Armed and Dangerous <input type="checkbox"/> 85 - Hemophilic <input type="checkbox"/> 55 - Alcoholic <input type="checkbox"/> 01 - Other <input type="checkbox"/> 70 - Suicidal <input type="checkbox"/> 05 - Violent Tendencies <input type="checkbox"/> 90 - Diabetic <input type="checkbox"/> 80 - Allergies <input type="checkbox"/> 65 - Epilepsy <input type="checkbox"/> 89 - Medication Required <input type="checkbox"/> 10 - Martial Arts Expert <input type="checkbox"/> 50 - Heart Condition <input type="checkbox"/> 30 - Known to abuse drugs <input type="checkbox"/> 25 - Escape Risk <input type="checkbox"/> 15 - Explosive Expertise <input type="checkbox"/> 30 - Sexually Violent Predator									
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 Meniefield**, the listed named defendant.

AFFIANT'S SIGNATURE:



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 **27**

DAY OF **December** 2020

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

Exhibit A p. 020

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EJW

Exhibit A p. 021

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

CRIMINAL DIVISION

COMPLAINT

DCTN: _____

Lockup No: _____

Case No: _____

District of Columbia ss:

Defendant's Name: Maurice Meniefield 586071 20181568
(First) (MI) (Last) (PDID) (CCNO)

Also Known As: _____
(First) (Middle) (Last)

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:



D2-1563

Affiant's Name

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



(Judge) (Deputy Clerk)

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

Judge - Superior Court of the District of Columbia

Title 16: ☐Rule 105: ☐ Judge: _____

Sex: Male	DOB: 02/06/1992	CCN: 20181568	PDID: 586071
Papering Officer: Christine Bonaci			Badge No.: D21563
OFFICER MUST EXECUTE RETURN			
Officer's Name:			Date / Time: December 24, 2020
AUSA Signature:			Fel. I <input type="checkbox"/> AFTC <input type="checkbox"/> Fel. II <input type="checkbox"/>

NCIC APPROVED - AUSA SHARON MARCUS-KURN

Exhibit A p. 022

Blank Page
SDM

Superior Court of the District of Columbia
CRIMINAL DIVISION

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

DEFENDANT'S NAME: ANDERSON, Tyra Monae					NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
SEX: F	RACE: BLK	DOB: 1/29/1993	HGT: 5'4	WGT: 130	EYES: BRN	HAIR: BLK	COMPL: DARK		SCARS, MARKS, TATOOS																			
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 style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 65 = Epilepsy</td> <td><input type="checkbox"/> 01 = Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 05 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 90 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Martial Arts Expert</td> <td><input type="checkbox"/> 50 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 60 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 55 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophilic</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>													<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 65 = Epilepsy	<input type="checkbox"/> 01 = Other (Explain)	<input type="checkbox"/> 05 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 90 = Diabetic	<input type="checkbox"/> 10 = Martial Arts Expert	<input type="checkbox"/> 50 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 60 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophilic	<input type="checkbox"/> 20 = Known to abuse drugs
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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. The caller stated they 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 Chanol N. Howard**TO: WARRANT CLERK**

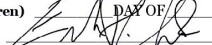
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

 ASSISTANT UNITED STATES ATTORNEY

12/01/20

SUBSCRIBED AND SWORN BEFORE ME THIS


 DAY OF 12/21/20
 (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**USW NO.:**

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

AFFIANT'S SIGNATURE:

X Chanel M. Howard

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

12/01/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

12/12/20
(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**USW NO.:**

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

AFFIANT'S SIGNATURE:x Chanel N. Howard**TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**12/01/20

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

12/2/20 DAY OF DECEMBER
(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**USW NO.:**

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

x *Charol N. Howard*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

Tyra Monae Anderson 12/01/20

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

Charol N. Howard DAY OF *Feb* 20 *12/21/20*

(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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae				NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
SEX: F	RACE: BLK	DOB: 1/29/1993	HGT: 5'4	WGT: 130	EYES: BRN	HAIR: BLK	COMPL: DARK	SCARS, MARKS, TATOOS																			
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DEFENDANT'S BUSINESS ADDRESS:							TELEPHONE NUMBER:																				
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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.

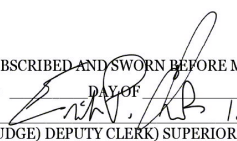
AFFIANT'S SIGNATURE:x Chanel N. Howard**TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

 12/01/20
 ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS


 DAY OF 12/1 20
 (JUDGE) DEPUTY CLERK(S) 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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae				NICKNAME:				ALIASES:				CCN: 20-022611		PDID / FBI: 598660															
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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 would've 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

AFFIANT'S SIGNATURE:x Chanel N. Howard**TO: WARRANT CLERK**

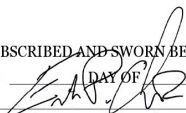
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**


12/01/20

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS



DAY OF 12 / 2 / 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**USW NO.:**

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

X *Charnell M. Williams*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

Tyra Monae Anderson
ASSISTANT UNITED STATES ATTORNEY

12/01/20

SUBSCRIBED AND SWORN BEFORE ME THIS

[Signature] DAY OF *12/2/20*
(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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae				NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
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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 ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**12/01/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

12/01/20 DAY OF 12/2/20
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
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-- NCIC APPROVED --

Superior Court of the District of Columbia
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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 OCME to observe the decedent's post-mortem examination. The examination was performed by Dr. Jonee 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 Chanol N. Howard**TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**


ASSISTANT UNITED STATES ATTORNEY

12/01/20

SUBSCRIBED AND SWORN BEFORE ME THIS



DAY OF 12 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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae					NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
SEX: F	RACE: BLK	DOB: 1/29/1993	HGT: 5'4	WGT: 130	EYES: BRN	HAIR: BLK	COMPL: DARK		SCARS, MARKS, TATOOS																			
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DEFENDANT'S BUSINESS ADDRESS:							TELEPHONE NUMBER:																					
COMPLAINANT'S NAME: M.A.							TELEPHONE NUMBER: None																					
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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.**

AFFIANT'S SIGNATURE:

x Chamell N. Hannon

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

12/01/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

12/12/20
(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**USW NO.:**

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

AFFIANT'S SIGNATURE:x Chanel N. Howard**TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

DAY OF

12 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**USW NO.:**

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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, IT's 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.

AFFIANT'S SIGNATURE:X Chanel N. Howard**TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: First Degree Felony Murder (Cruelty to Children)
12/01/20
 ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

12/12/20
 (JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
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-- NCIC APPROVED --

Superior Court of the District of Columbia
CRIMINAL DIVISION

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

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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:

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ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

DAY OF

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Superior Court of the District of Columbia
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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 father fell." Then Tyra recanted 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 IT's

AFFIANT'S SIGNATURE:X *Chanel M. Howard***TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

DAY OF

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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae					NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
SEX: F	RACE: BLK	DOB: 1/29/1993	HGT: 5'4	WGT: 130	EYES: BRN	HAIR: BLK	COMPL: DARK		SCARS, MARKS, TATOOS																			
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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[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:x *Chanel N. Howard***TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)***Natasha Brown* 12/01/20

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS _____

[Signature] DAY OF 12/2/20

(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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae				NICKNAME:				ALIASES:				CCN: 20-022611		PDID / FBI: 598660															
SEX: F	RACE: BLK	DOB: 1/29/1993	HGT: 5'4	WGT: 130	EYES: BRN	HAIR: BLK	COMPL: DARK		SCARS, MARKS, TATOOS																				
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DEFENDANT'S BUSINESS ADDRESS:								TELEPHONE NUMBER:																					
COMPLAINANT'S NAME: M.A.								TELEPHONE NUMBER: None																					
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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 grandmothers in regards to the investigation. Based on this information, the caller appears to be comingling 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 member 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 ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

 ASSISTANT UNITED STATES ATTORNEY

12/01/20

SUBSCRIBED AND SWORN BEFORE ME THIS _____


 (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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae				NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
SEX: F	RACE: BLK	DOB: 1/29/1993	HGT: 5'4	WGT: 130	EYES: BRN	HAIR: BLK	COMPL: DARK	SCARS, MARKS, TATOOS																			
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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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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 the 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 fathers' 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.

AFFIANT'S SIGNATURE:x Chanel N. Howard**TO: WARRANT CLERK**

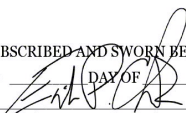
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

 ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS _____

DAY OF _____

 12/2/20

(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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae				NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
SEX: F	RACE: BLK	DOB: 1/29/1993	HGT: 5'4	WGT: 130	EYES: BRN	HAIR: BLK	COMPL: DARK	SCARS, MARKS, TATOOS																			
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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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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 ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**
12/01/20
 ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS _____

 (DAY OF 12 12 20)
 (JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
 DISTRICT OF COLUMBIA

-- NCIC APPROVED --

Superior Court of the District of Columbia
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AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT**USW NO.:**

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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 ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**


12/01/20

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS _____



DAY OF _____ 20____
(JUDGE) DEPUTY CLERK(S) 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**USW NO.:**

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

AFFIANT'S SIGNATURE:

X *Chamell N. Hazzard*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

DAY OF

12/2/20

(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**USW NO.:**

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

X Chanel M. Howard

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

12/01/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS _____

12/21/20
(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**USW NO.:**

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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 Chanol N. Howard**TO: WARRANT CLERK**

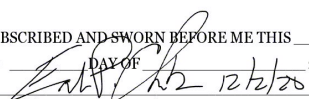
PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

 ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

DAY OF

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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae				NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
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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 IT's 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

AFFIANT'S SIGNATURE:x Chanel N. Howard**TO: WARRANT CLERK**

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**
Chanel N. Howard
 ASSISTANT UNITED STATES ATTORNEY

12/01/20

SUBSCRIBED AND SWORN BEFORE ME THIS

W. J. Roberts 12/2/20
 (JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
 DISTRICT OF COLUMBIA

-- NCIC APPROVED --

Superior Court of the District of Columbia
CRIMINAL DIVISION

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<table style="width: 100%; border: none;"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 65 = Epilepsy</td> <td><input type="checkbox"/> 01 = Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 05 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 90 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Martial Arts Expert</td> <td><input type="checkbox"/> 50 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 60 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 55 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophilic</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>												<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 65 = Epilepsy	<input type="checkbox"/> 01 = Other (Explain)	<input type="checkbox"/> 05 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 90 = Diabetic	<input type="checkbox"/> 10 = Martial Arts Expert	<input type="checkbox"/> 50 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 60 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophilic	<input type="checkbox"/> 20 = Known to abuse drugs
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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:

X *Charnell M. Harrison*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge 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**USW NO.:**

DEFENDANT'S NAME: ANDERSON, Tyra Monae				NICKNAME:		ALIASES:		CCN: 20-022611		PDID / FBI: 598660																	
SEX: F	RACE: BLK	DOB: 1/29/1993	HGT: 5'4	WGT: 130	EYES: BRN	HAIR: BLK	COMPL: DARK	SCARS, MARKS, TATOOS																			
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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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

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.

AFFIANT'S SIGNATURE:

X Chanel M. Howard

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

TYRA MONAE ANDERSONCharge With: **First Degree Felony Murder (Cruelty to Children)**

ASSISTANT UNITED STATES ATTORNEY



12/01/20

SUBSCRIBED AND SWORN BEFORE ME THIS

DAY OF 12 2012
Chanel M. Howard
 (JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
 DISTRICT OF COLUMBIA

-- NCIC APPROVED --

ATTACHMENT A



November 2019		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.
December 6, 2019		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.
January 15, 2020		Decedent's father was barred from the Quality Inn because of an incident with the defendant.
FEBRUARY 1, 2020 SATURDAY	20:34 p.m.	<p>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.</p>  
	20:35	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.

		
FEBRUARY 2, 2020 SUNDAY	14:40	<p>Defendant walks out to decedent's father car and does not have either of her children.</p>  <p>215 2020-02-02 14:40:24</p> <p>Defendant returning to room# 214.</p>  <p>02-02-2020 Sun 14:49:11</p> <p>2ND Floor E1</p>
	16:05	<p>Defendant goes outside to decedent's father's car without either of her children.</p>

		 <p>Defendant returns to room# 214 with food.</p> 
	20:10	<p>Defendant walks outside 20-month-old child to meet with decedent's father. She does not have the decedent.</p> 
	20:17	<p>Defendant, W8 and 20-month-old child return to hotel. They do NOT have the decedent.</p>

		
20:18	Defendant, 20-month-old child and W8 leave the Room#214. They do not have the decedent.	
20:27	Defendant, 20-monthold child and W8 return to room with cup of ice.	

		
	<p>21:51</p> <p>Defendant, 20-month-old child and W8, without decedent, leave room and go outside to decedent's father car.</p>	
	<p>22:03</p> <p>Defendant, 20-month-old child and W8, without decedent, return to room #214.</p>	

FEBRUARY 3, 2020 MONDAY	8:34	<p>Defendant walks W8 outside to father's car. Neither the decedent nor 20-month-old child is with her.</p> 
	12:34	<p>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.</p> 
		<p>DEFENDANT AND CHILDREN ARE NOT IN HOTEL FOR OVER 24 HOURS.</p> <p>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.</p>
	19:18	<p>Decedent's father works from 8:00 P.M. TO 8:00 A.M. at Revel Security</p> <p>Decedents' father brings defendant back to hotel and defendant has the 20-month-old child. There are no signs of the decedent.</p>

		 
19:34	Defendant returns to decedent's fathers' car with a back pack and 20-month-old child.	

FEBRUARY 4, 2020 TUESDAY	20:07	<p>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.</p> 
FEBRUARY 5, 2020 WEDNESDAY		<p>No sighting of the decedent all day.</p>
	16:41	<p>Defendant goes to a neighbor's door, returns to room one minute later.</p> 
	19:48	<p>Defendant takes 20-month- old child to get food at hotel cafeteria.</p>

19:49	<div data-bbox="358 207 760 404">  </div> <p data-bbox="358 407 827 445">Defendant walking in lobby with 20-month-old child, she does not have the decedent.</p> <div data-bbox="358 487 794 701">  </div>
19:52	<p data-bbox="358 764 739 782">Defendant returns to room #214 with 20-month-old child.</p> <div data-bbox="358 803 817 1031">  </div>
22:54	<p data-bbox="358 1055 786 1093">Defendant carries 20-month-old child to decedent's fathers' car. Decedent is not with the defendant.</p>

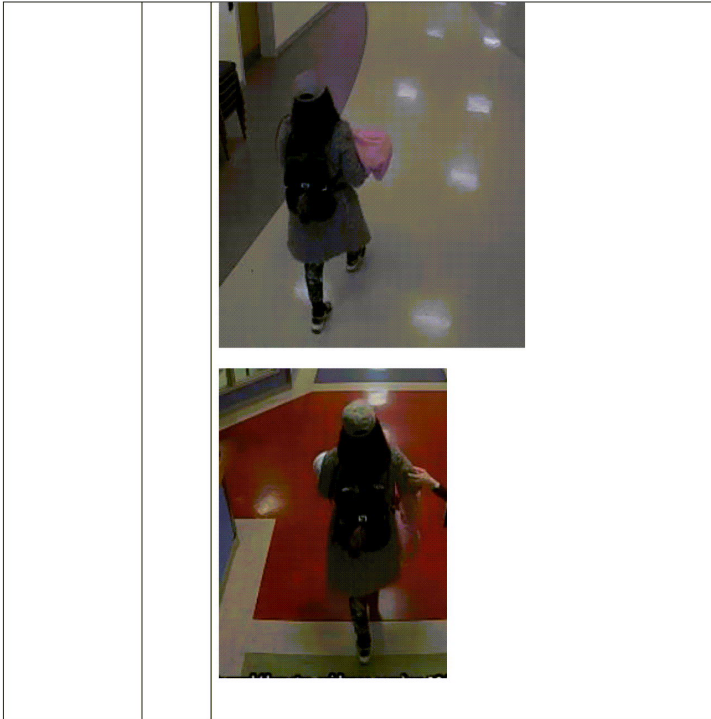
		
	23:06	<p>Defendant returns to room #214 with 20-month-old child.</p> 

<p>FEBRUARY 6, 2020 THURSDAY</p>	<p>14:11</p>	<p>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.</p>  <p>215 2020-02-06 14:05:29</p> <p>02-06-2020 Thu 14:13:46</p> <p>ENT. LEFT</p>
---	--------------	--

14:35

Defendant carries decedent wrapped in a blanket into Children's National Medical Center.





			
	14:42	Decedent is pronounced dead.	
	15:02	MPD arrives at CNMC.	
	17:26 – 19:57	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.	
	19:00	Detective Green interviews decedent's father.	

Exhibit C p. 001

2020 CRWSLD 4707

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

CRIMINAL DIVISION

COMPLAINT

DCTN: _____
 Lockup No: _____
 Case No: _____

District of Columbia ss:

Defendant's Name: Ta'Jeanna Eason 20053489
 (First) (MI) (Last) (PDID) (CCNO)

Also Known As: _____
 (First) (Middle) (Last)

Address: Ika 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 wilfully 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, and 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
Jonathan H. Pittman
 (Judge) (Deputy Clerk)

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
Jonathan H. Pittman
 Judge - Superior Court of the District of Columbia

Title 16: ☐ Rule 105: ☐ Judge: _____

Sex: Female	DOB: 08/19/1989	CCN: 20053489	PDID:
Papering Officer: Det. Anthony Greene			Badge No.: D2-1515
OFFICER MUST EXECUTE RETURN			
Officer's Name:			Date / Time: October 17, 2020
AUSA Signature: <u>[Signature]</u> 10/17/20			Fel. I <input checked="" type="checkbox"/> AFTC <input type="checkbox"/> Fel. II <input type="checkbox"/>

Exhibit C p. 002

2020 CRW 4707

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEPENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:		CON: 20-053489		PIDD:																	
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																					
DEPENDANT'S HOME ADDRESS: 1KA 935 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 491-1608																					
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:																					
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 wanted person when using the caution indicator.																													
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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 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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charged With: First Degree Murder; Felony Murder (Crucial to Children)

Michael R. Jones 10/15/20
ASSISTANT UNITED STATES ATTORNEY

- NCIC APPROVED -

Form CD(17)-1050

JAP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20

Jonathan H. Pelt
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-20-06

Exhibit C p. 003

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:		ALIASES:		CCN: 20-053489		PMD:																	
SEX: Female	RACE: Black	DOB: 8/19/1989	HT: Unk	WT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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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 lividity 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.

- The decedent has been identified as G.E., with a date of birth of December 12, 2017.
- The child's mother, Ta'Jeanna 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.
- 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.

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge: *1st Degree Murder; 2nd Degree Murder; Assault on Children*

Notarized 10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME, THIS

22nd DAY OF October 20 20

Jonathan H. Pelt
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CR-17 (10/20)

NOT APPROVED

Revision Dates: 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.:

DEFENDANT'S NAME: Ta'Jearna EASON				NICKNAME:				ALIASES:		CCN: 28-053489		PDID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																				
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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 I.E.'s head. She made no mention of any other injuries and stated I.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 I.E.'s forehead and asked if that had always been there. EASON replied no. Officer Alexander then observed I.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 I.E. beside her on the couch and yelled out, "My son does not act 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 a head injury. I.E. appeared groggy, but started to respond and cry a little. EASON then had I.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 Afari that D.C. Fire/EMS Paramedic O'Bryne opined on the

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jearna Eason

Charge: Child First Deg. Murder-Felony 2nd order 1 Unsettled Child(ren)

[Signature] 10/27/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

[Signature]
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD-101 (05/19)

[Signature] JUDGE APPROVED -

Revision Date: 11-09-06

Exhibit C p. 005

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:		ALIASES:		CCN: 20-053469	PDID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: EKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1698																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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 wanted person when using the caution indicator.																									
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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 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 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 thymus gland; acute abdomen injuries

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

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

[Signature] 10/17/20
ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

Form CJD-100 *[Signature]*

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

[Signature]
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-09-05

Exhibit C p. 006

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:		CC#: 20-053489		POID:															
SEX: Female	RACE: Black	D.O.B.: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LGA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																		
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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 with associated subscalp 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 MedStat
8. Georgetown University Hospital Pathology Consultation Reports

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

AFFIANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge: 1st Degree Murder-Police Murder (Crucial to Children)

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

- NCIC APPROVAL -

Form CR-17-1020

Revision Date: 11-29-03

Exhibit C p. 007

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ja'quan EASON				NICKNAME:				ALIASES:				CCN: 20-033489		FIND:															
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																					
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 491-1608																					
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:																					
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019								DATE OF OFFENSE: April 1, 2020				TIME OF OFFENSE: 8:25 hours																	
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																													

go of the corpus collosum (associated with trauma)

- Mild vitreous hemorrhage, bilateral
- Not unfractured or acute nerve sheath hemorrhages

Intro

- Marginal and comminuted
- Blended rib fractures (There were examined by anthropologist Dr. Jansie who found 36 rib fractures - 31 of which were acute and six were healing with a minimum of two respiratory events)
- Posterior ribcage hemorrhage
- Posterior epidural and subdural venous hemorrhages. (In Dr. Jansie's opinion, this type of injury takes a tremendous amount of force)
- Hemopericardium (6 milliliters of blood inside the pericardium)
- Hemoperitoneum (50 milliliters of blood inside abdominal cavity)
- Left retroperitoneal hematoma (soft tissue back and abdomen)
- Left hematuria with subcapsular hemorrhages
- Left kidney laceration
- Peripancreatic and adrenal capsule hemorrhages
- Left adrenal hemorrhage

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

To Ja'quan EASON

Chief of Police, Washington, District of Columbia

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN TO before me this

20th day of October 20

Anthony D. Greene
JUDGE (DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Form CM-17-1 (Rev. 1/17)

Revised June 21, 2016

Exhibit C p. 008

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:				CCN: 20-053489		POID:																			
SEX: Female		RACE: Black		DOB: 8/19/1989		HGT: Unk		WGT: Unk		EYES: Brown		HAIR: Black		COMPL: Med		SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019										TELEPHONE NUMBER: (202) 491-1008																							
COMPLAINANT'S NAME: G.E.										TELEPHONE NUMBER:																							
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019										DATE OF OFFENSE: April 1, 2020				TIME OF OFFENSE: 8:25 hours																			
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																																	

12. Bilateral spermatic cord hemorrhages
13. Bowel contusions

12. 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 scabbing 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 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 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. TA'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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge: 1st Degree Murder (Child) to Child

10/17/20
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

Form CD-17-1050

-NJC APPROVED-
JRP

Revision Date: 11-29-05

Exhibit C p. 009

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEPENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:				CCN: 20-053489		PDID:	
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med		SCARS, MARKS, TATTOOS: Unknown						
DEPENDANT'S HOME ADDRESS: LCA 935 Division Ave NE, #6 Washington, DC, 20019								TELEPHONE NUMBER: (202) 491-1408							
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:							
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 wanted person when using the caution indicator.															
<input type="checkbox"/> 00 - Armed and Dangerous <input type="checkbox"/> 05 - Violent Tendency <input type="checkbox"/> 10 - Mutual Arms Expert <input type="checkbox"/> 15 - Explosive Expertise				<input type="checkbox"/> 25 - Escape Risk <input type="checkbox"/> 30 - Sexually Violent Predator <input type="checkbox"/> 50 - Heart Condition <input type="checkbox"/> 55 - Alcoholic				<input type="checkbox"/> 55 - Epilepsy <input type="checkbox"/> 70 - Suicidal <input type="checkbox"/> 80 - Medications Required <input type="checkbox"/> 85 - Hemophilia				<input type="checkbox"/> 01 - Other (Explain) <input type="checkbox"/> 90 - Diabetic <input type="checkbox"/> 95 - Allergies <input type="checkbox"/> 20 - Known to abuse drugs			
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 Chanel 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.

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Copy to the First Dep. Murder, Felony Murder, Cracks to Children

10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22d DAY OF October 20 20

Jonathan A. Bell
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD-17 (10-20)

APPROVED -
JAP

Revision Date: 11-29-06

Exhibit C p. 010

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna FASON				NICKNAME:				ALIASES:				CCN: 20-053489		PHID:															
SEX: Female	RACE: Black	DOB: 8/19/1989	HAIR: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																					
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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 wanted person where using the caution indicator.																													
<table border="0"> <tr> <td><input type="checkbox"/> 00 - Armed and Dangerous</td> <td><input type="checkbox"/> 25 - Escape Risk</td> <td><input type="checkbox"/> 45 - Liquefied</td> <td><input type="checkbox"/> 61 - Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 05 - Violent Tendencies</td> <td><input type="checkbox"/> 30 - Sexually Violent Predator</td> <td><input type="checkbox"/> 70 - Suicidal</td> <td><input type="checkbox"/> 60 - Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 - Mental Axis Expert</td> <td><input type="checkbox"/> 50 - Heart Condition</td> <td><input type="checkbox"/> 80 - Medication Required</td> <td><input type="checkbox"/> 60 - Allergic</td> </tr> <tr> <td><input type="checkbox"/> 15 - Explosive Expertise</td> <td><input type="checkbox"/> 55 - Alcoholic</td> <td><input type="checkbox"/> 85 - Incontinent</td> <td><input type="checkbox"/> 20 - Known to abuse drugs</td> </tr> </table>														<input type="checkbox"/> 00 - Armed and Dangerous	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 45 - Liquefied	<input type="checkbox"/> 61 - Other (Explain)	<input type="checkbox"/> 05 - Violent Tendencies	<input type="checkbox"/> 30 - Sexually Violent Predator	<input type="checkbox"/> 70 - Suicidal	<input type="checkbox"/> 60 - Diabetic	<input type="checkbox"/> 10 - Mental Axis Expert	<input type="checkbox"/> 50 - Heart Condition	<input type="checkbox"/> 80 - Medication Required	<input type="checkbox"/> 60 - Allergic	<input type="checkbox"/> 15 - Explosive Expertise	<input type="checkbox"/> 55 - Alcoholic	<input type="checkbox"/> 85 - Incontinent	<input type="checkbox"/> 20 - Known to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																													

17. On April 1, 2020, D.C. Child and Family Services Agency (CFSA) began a joint investigation with MPD regarding G.E.'s death. As a result, later in the day on April 1, CFSA 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), hemothorax 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 older injuries. M.E. disclosed to the CNMC Emergency Room physician that Antonio [TURNER] 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 cold. 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 get up in the middle of the

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Fason

Chief of the First Dep. Member Police (Court to Child Care)

[Signature] 10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20

[Signature]
(JUDGE) (DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CCR-10-0030

NOT APPROVED -

Revision Date: 11-29-05

Exhibit C p. 011

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEPENDANT'S NAME: Ta'Jaenna EASON				NICKNAME:				ALIASES:		CCN: 20-051489	PDID:																
SEX: Female	RACE: Black	DOB: 3/19/1989	HGT: Unk.	WGT: Unk.	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS Unknown																			
DEPENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019								TOLL PHONE NUMBER: (202) 491-1608																			
COMPLAINANT'S NAME: G.E.								TOLL PHONE NUMBER:																			
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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 45 = Epilepsy</td> <td><input type="checkbox"/> 01 = Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 05 = Violent Tendencies</td> <td><input type="checkbox"/> 50 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 02 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Arts Expert</td> <td><input type="checkbox"/> 55 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 40 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 55 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophiliac</td> <td><input type="checkbox"/> 70 = Known to abuse drugs</td> </tr> </table>												<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 45 = Epilepsy	<input type="checkbox"/> 01 = Other (Explain)	<input type="checkbox"/> 05 = Violent Tendencies	<input type="checkbox"/> 50 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 02 = Diabetic	<input type="checkbox"/> 10 = Mental Arts Expert	<input type="checkbox"/> 55 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 40 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophiliac	<input type="checkbox"/> 70 = Known to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

night to change his siblings' diapers and, if in the morning the children's diapers were wet, he would get beaten. M.E. stated that his mother 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 EASON'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, YISD Detective Afari told your affiant that while M.E. was being screened by the CNMC medical staff, M.E. disclosed that his step-father Antonio [TURNER], hits 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, EASON was informed by a CFSA Social Worker that, based on the unexplained injuries to both M.E. and I.H., the children were being temporarily removed from her care and placed in foster care through CFSA.

22. As indicated above, at the time of G.E.'s death, EASON 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'Jaenna Eason

[Signature] 100/17/20
CHIEF OF POLICE, District of Columbia

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd

DAY OF

October

20

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

Form CCR-17-000

NEC APPROVED -

[Signature]

Revision Date: 11-29-05

Exhibit C p. 012

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Tajanna EASON				NICKNAME:				ALIASES:		CC#: 20-053489	PHID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk.	WGT: Unk.	EYES: Brown	HAIR: Black	COMPT.: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 933 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 491-1688																			
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:																			
LOCATION OF OFFENSE: 933 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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td>00 = Armed and Dangerous</td> <td>25 = Gangs Risk</td> <td>65 = Injurious</td> <td>81 = Other (Specify)</td> </tr> <tr> <td>05 = Violent Terrorism</td> <td>30 = Sexually Violent Predator</td> <td>70 = Suspect</td> <td>90 = Deafness</td> </tr> <tr> <td>10 = Mental Age Report</td> <td>35 = Heart Condition</td> <td>80 = Medication Required</td> <td>95 = Allergic</td> </tr> <tr> <td>15 = Explosive Expertise</td> <td>38 = Asbestos</td> <td>83 = Heterophile</td> <td>98 = Susceptible to abuse drugs</td> </tr> </table>												00 = Armed and Dangerous	25 = Gangs Risk	65 = Injurious	81 = Other (Specify)	05 = Violent Terrorism	30 = Sexually Violent Predator	70 = Suspect	90 = Deafness	10 = Mental Age Report	35 = Heart Condition	80 = Medication Required	95 = Allergic	15 = Explosive Expertise	38 = Asbestos	83 = Heterophile	98 = Susceptible to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:

INTERVIEW OF TAJANNA 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 I.E. and G.E. When she went to the bedroom, she observed I.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 I.E.'s face and asked M.P. what happened. EASON reported that M.P. said something about them playing and that I.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 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 sometime after G.E. turned a year old, she started to notice bruises on him and further explained that she started to notice the bruises on G.E. after she met TURNER. EASON stated that she initially thought TURNER was responsible for the injuries, but then surmised 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 bruising to G.E., she and TURNER questioned M.P. about how G.E. was injured. EASON reported that

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Tajanna Eason

Copied to: [Signature] (Print Name, Number, Station, Number, County, or District)

10/17/20
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 FD-170 (10-17-20) JAF

Revised Date: 11-09-05

Exhibit C p. 013

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:		CCN: 20-053489	PDID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1008																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 45 = Epilepsy</td> <td><input type="checkbox"/> 01 = Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 03 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 90 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Arts Expert</td> <td><input type="checkbox"/> 50 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 60 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 55 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophilia</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>												<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 45 = Epilepsy	<input type="checkbox"/> 01 = Other (Explain)	<input type="checkbox"/> 03 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 90 = Diabetic	<input type="checkbox"/> 10 = Mental Arts Expert	<input type="checkbox"/> 50 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 60 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophilia	<input type="checkbox"/> 20 = Known to abuse drugs
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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 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.

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge: First Degree Murder-Felony Murder (Crucial to Children)

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd

DAY OF

October

20 20

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

CMC APPROVED -

Form CD-17 (10/15)

Revision Date: 11-29-05

Exhibit C p. 014

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:				CCN: 20-053489		PID:															
SEX: Female	RACE: Black	DOB: 8/19/1989	HT: Unk	WG: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																					
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 491-1608																					
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:																					
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 wanted person when using the caution indicator.																													
<table border="0"> <tr> <td>06 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>65 = Epilepsy</td> <td>91 = Other (Explain)</td> </tr> <tr> <td>05 = Violent Tendencies</td> <td>30 = Sexually Violent Predator</td> <td>70 = Suicidal</td> <td>90 = Unstable</td> </tr> <tr> <td>10 = Martial Arts Expert</td> <td>50 = Heart Condition</td> <td>80 = Medication Required</td> <td>50 = Allergies</td> </tr> <tr> <td>15 = Explosive Expertise</td> <td>55 = Alcoholic</td> <td>85 = Hemophiliac</td> <td>20 = Known to abuse drugs</td> </tr> </table>														06 = Armed and Dangerous	25 = Escape Risk	65 = Epilepsy	91 = Other (Explain)	05 = Violent Tendencies	30 = Sexually Violent Predator	70 = Suicidal	90 = Unstable	10 = Martial Arts Expert	50 = Heart Condition	80 = Medication Required	50 = Allergies	15 = Explosive Expertise	55 = Alcoholic	85 = Hemophiliac	20 = Known to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																													

"So I beat his ass. Yes, I did. I didn't like to hit him up to the point where he -- you know, 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 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 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 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 "sneaky" 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.

AFFIANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charged With: First Degree Murder; Second Degree Murder; (to Childless)

10/17/20
ASSISTANT UNITED STATES ATTORNEY

-- NCIC APPROVED --

Form CD-17-1050

JAP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20

Lynette H. Pelt
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Dates: 11-29-05

Exhibit C p. 015

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jenna EASON				NICKNAME:		ALIASES:		CON: 20-032409	PDID:
SEX: Female	RACE: Black	DOB: 8/19/1999	HGT: 5'6"	WGT: 135	LYN: Brown	HAR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown	
DEFENDANT'S HOME ADDRESS: LEA 925 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 391-608		
COMPLAINANT'S NAME: G.I.							TELEPHONE NUMBER:		
LOCATION OF OFFENSE: 925 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: A25 hours
CAUTION AND MEDICAL CONDITIONS (if any) Select a valid ICD code below for mental persons when using the caution instance.									
00 Armed and Dangerous		25 Loose End		45 Unhappy		60 Other (Specify)			
05 Violent Tendencies		30 Growth - No New Products		70 Suicidal		95 Debris			
10 Mental Abuse/Aggrav		50 Heart Condition		80 Medication Required		65 Abuses			
15 Explosive Response		35 Alcohol		85 Homophobia		20 Known to abuse drugs			
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:									

30. EASON admitted that she disciplined all of her kids, including G.I., who was the youngest, but claimed he did not get too much physical discipline. EASON further admitted that she would "pop his hands, pop his legs, or just say 'look little boy don't do that.'" EASON added that she didn't really discipline G.I. or L.J. because they were small. She said, "If they do get hit, it's like a pop or a pinch 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 Chanel Howard and George Taylor at MPD's Sixth District Station. Later that same day, he was interviewed by your affiant and MPD Detective David Dalcour 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 7:00 a.m.) on March 31, 2020, to take EASON to a doctor's appointment at George Washington University Hospital, leaving the children unsupervised by an adult, with three-year-old L.J. and two-year-old G.I. in the care of 11-year-old M.E. 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 attempted to

AFFIDANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jenna Eason

Charge: 18-101 (Dist. Att. - Victim: Eason, Misdemeanor (Given by to Undersigned))

10/17/20
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

Form 10/17/20

JP

Revision Date: 07-06-00

Exhibit C p. 016

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:		ALIASES:		CCN: 20-053489		PMD:																	
SLX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1408																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td>00 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>45 = Epilepsy</td> <td>60 = Other (Specify)</td> </tr> <tr> <td>05 = Violent Threats</td> <td>30 = Sexually Violent Predator</td> <td>50 = Suicidal</td> <td>90 = Diabetic</td> </tr> <tr> <td>10 = Mental Arts Expert</td> <td>35 = Heat Condition</td> <td>80 = Medication Required</td> <td>60 = Allergies</td> </tr> <tr> <td>15 = Explosive Expertise</td> <td>35 = Alcoholic</td> <td>85 = Hemophilia</td> <td>20 = Known to abuse drugs</td> </tr> </table>												00 = Armed and Dangerous	25 = Escape Risk	45 = Epilepsy	60 = Other (Specify)	05 = Violent Threats	30 = Sexually Violent Predator	50 = Suicidal	90 = Diabetic	10 = Mental Arts Expert	35 = Heat Condition	80 = Medication Required	60 = Allergies	15 = Explosive Expertise	35 = Alcoholic	85 = Hemophilia	20 = Known to abuse drugs
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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.E.). TURNER said his weight bar (which he described as a skinny ten pound metal bar) was on the sofa next to the decedent. Your affiant 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 smacked the decedent's hand 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 I.E. holding his head. TURNER did not attempt to get any medical assistance for I.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 some antacid 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.E. 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:

Ta'Jeanna Eason

Charge: *18 USC 2241(a)(1) - False Statement to a Law Enforcement Officer*

10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

Jonathan H. Roth
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CCR-75-1050

NSC APPROVED -

JHP

Revision Date: 05-09-05

Exhibit C p. 017

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:		CON: 20-053489	PDID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk.	WGT: Unk.	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: 1K A 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wasted person when using the caution indicator.																											
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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 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 EASON 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 whopping." 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:

Ta'Jeanna Eason

Charge: 1st-Deg. Murder; 2nd-Deg. Murder; (Crimes to Children)

30/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20

[Signature]
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD-17 (05/01)

JHP

Revision Date: 11-29-06

Exhibit C p. 018

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:		CCN: 20-053489	POID:
SEX: Female	RACE: Black	DOD: 8/19/1989	DOB: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown			
DEFENDANT'S HOME ADDRESS: EKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:				
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 (CNC) Select a valid CNC code below for wanted persons when using the caution indicator.											
00 = Armed and Dangerous			25 = Large Build			45 = Impaired			61 = Other (Specify)		
05 = Violent Tendencies			30 = Sexually Violent Predator			70 = Suicidal			70 = Deterior		
10 = Mental Instability			30 = Non-Compliant			80 = Medication Required			60 = Allergies		
15 = Employee Suspended			35 = Alcoholic			85 = Homeless			20 = Known to abuse drugs		

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 rough. 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 pampers down and pop them with a belt" (NOTE: There were linear marks on their thighs consistent with being hit with a belt).

39. During the later interview on April 1, 2020, conducted by your affiant and Detective Delencour, 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 seized TURNER's cellular telephone device and prior to concluding the interview, received written consent from TURNER to forensically examine and process his cellular telephone for evidence.

INTERVIEWS of M.R.

40. On scene, M.R. spoke to Officer Pogle and stated: "I didn't do anything, everyone was sleeping. Nothing happened, I don't know what happened."

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge: (1) First Degree Murder (2) Second Degree Murder (3) Assault on Child(ren)

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

Form C-9(7)-0909

JAP JUDGE APPROVED

Revision Date: 11-06-09

Exhibit C p. 019

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Tejeanna LASON				NICKNAME:				ALIAS:				CCN: 20-052489		PDID:															
SEX: Female	RACE: Black	DOB: 3/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATOOS: Unknown																					
DEFENDANT'S HOME ADDRESS: 1KA 915 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 491-1608																					
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:																					
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 wanted person when using the caution indicator.																													
<table border="0"> <tr> <td>00 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>45 = Intoxicated</td> <td>01 = Other (Explain)</td> </tr> <tr> <td>03 = Violent Tendencies</td> <td>30 = Sexually Violent Predator</td> <td>70 = Suicidal</td> <td>20 = Diabetic</td> </tr> <tr> <td>10 = Mental Arts Expert</td> <td>50 = Heart Condition</td> <td>80 = Medication Required</td> <td>60 = Allergies</td> </tr> <tr> <td>15 = Explosive Expert</td> <td>55 = Alcoholic</td> <td>85 = Homicidal</td> <td>20 = Known to those drugs</td> </tr> </table>														00 = Armed and Dangerous	25 = Escape Risk	45 = Intoxicated	01 = Other (Explain)	03 = Violent Tendencies	30 = Sexually Violent Predator	70 = Suicidal	20 = Diabetic	10 = Mental Arts Expert	50 = Heart Condition	80 = Medication Required	60 = Allergies	15 = Explosive Expert	55 = Alcoholic	85 = Homicidal	20 = Known to those drugs
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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 LASON's knowledge and consent. When the Detectives first met M.E., he had a black left 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 "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 he 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 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

AFFIRANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Tejeanna Lason

Charge: 1st Degree Assault on a Police Officer (Crimes Against Children)

10/19/20
ASSISTANT UNITED STATES ATTORNEY

-ADP APPROVAL

Form CD-100

JHP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October

20

George H. [Signature]
GEORGE DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-05

Exhibit C p. 020

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME Ta'Jeanna FASON				NICKNAME:				ALIASES:				CCN 20-051489		FMD:	
SEX Female	RACE Black	DOB 8/19/1989	HGT Unk	WGT Unk	EYES Brown	HAIR Black	COMPL Med	SCARS, MARKS, TATTOOS Unknown							
DEFENDANT'S HOME ADDRESS 1KA 935 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 491-1608							
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:							
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 wanted person when using the caution indicator.															
— 00 = Armed and Dangerous				— 25 = Escape Risk				— 45 = Epilepsy				— 01 = Other (Explain)			
— 05 = Victim Testifies				— 30 = Sexually Violent Predator				— 10 = Suicidal				— 50 = Diabetic			
— 10 = Mental Arts Expert				— 50 = Heart Condition				— 10 = Medication Required				— 60 = Allergies			
— 15 = Explosive Expertise				— 55 = Alcoholic				— 15 = Hemophilia				— 20 = Known to abuse drugs			
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:															

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:

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

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Fason

Charged With: First Degree Murder, Felony Murder (Crimes In Children)

[Signature]
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October

20

[Signature]
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CCR-17-1000

[Signature]
JAC APPROVED

Revision Date: 11-29-00

Exhibit C p. 021

Superior Court of the District of Columbia
CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

DISCUSSION

REPORTING AGENCY LA County BACW		INCIDENT #		A. CASE #		CEN. 26-05984		PDR#	
SOCIAL	RACE	DOB	HT	WT	EYES	HAIR	SKIN	SCARS/MARKS	TATTOOS
Female	Caucasian	07/19/59	5'6"	125	Brown	Black	Fair	None	None
DEPARTMENT'S INCIDENT NUMBER LA 935 Division Ave NE, 46 W Jackson, DC 20019					TELEPHONE NUMBERS (202) 491-1608				
COMPLAINANT'S NAME: G.B.					TELEPHONE NUMBER:				
LOCATION OF OFFENSE: 935 Division Ave NE, 46 W Jackson D.C. 20019					DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 9:25 hours		
CALL FOR AND MEDICAL CONSENT(S)(CNC) Select a valid CNC code below for violent persons when making the criminal incident.									
00 - Armed and Dangerous	25 - Escape Risk	... 65 - Rape/sex	01 - Other (Specify)						
08 - Violent Tendency	30 - Sexually Violent Predator	70 - Sexual	06 - Delinquency						
10 - Mental Area Sign	50 - Threat Credit on	80 - Involuntary Hospital	00 - All types						
15 - Explosive Potential	55 - Alcoholism	85 - Bomb/Guns	75 - Subject to Abuse drugs						
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:									

- o [TURNER] went to his Doctor's appointment on the morning of March 31, 2026, leaving them home alone.
- o During that assault, M.E. reported he heard slaps and his brother started to cry before Antonio [TURNER] told them to "SHUT UP, SHUT UP"
- o He looked up a video on YouTube that pertained to step-parents making lives miserable for children.
- o He believes that his step-father Antonio [TURNER] would stop abusing his brothers when they were able to talk and articulate themselves.
- o 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.
- o The day after the last assault, he observed marks on L.E.'s neck, which his mother immediately blamed M.E. for inflicting.
- o M.E. reported historical beatings at the hands of his mother, using the palms of her hands, her fists, and a belt.
- o 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.
- o His step-father was aggressive to L.E. and G.B.

47. M.E. denied hitting G.B. or L.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] ask

AFFIANT'S SIGNATURE: *x Anthony D. Greene*

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:
Ta'Jeanna Eason
Charge(s) First Degree Murder (Crim. Code § 9A.01.01)
Assistant United States Attorney 10/17/00

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd day of October 2020
[Signature]
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD0178-1250 *JAP* JUDICIAL APPROPRIATE
Revision Date: 11-29-00

Exhibit C p. 022

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:		ALIASES:		CCN: 284053419		PDID:																	
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL.: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: 16A 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1408																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 925 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 wanted person when using the caution indicator.																											
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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] smacked 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.

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 I.E. on April 1, 2020, and prepared a Child and Adolescent Protection Center (CAPC) consult report with the following medical findings:

- o I.E. suffered several different injuries, including fractured ribs and a lacerated liver.
- o There is evidence of old and new rib fractures, with the older healing rib fractures occurring at least two weeks prior from I.E.'s presentation to the hospital on April 1, 2020.
- o 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:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge (VTC): First Deg. Murder, Felony Murder, Crim. to Child(ren)

80/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

Jonathan V. Pelt
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD-177-1020 - NISC APPROVED -

Form CD-177-1020

Revision Date: 11-29-06

Exhibit C p. 023

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jearna EASON				NICKNAME:		ALIASES:		CCN: 20-053489		PMD:																	
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unkn/240																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																				
COMPLAINANT'S NAME: G.F.							TELEPHONE NUMBER:																				
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 wasted person when using the caution indicator.																											
<table border="0"> <tr> <td>00 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>45 = Epilepsy</td> <td>01 = Other (Explain)</td> </tr> <tr> <td>01 = Violent Tendencies</td> <td>30 = Sexually Violent Predator</td> <td>70 = Suicidal</td> <td>90 = Diabetic</td> </tr> <tr> <td>10 = Mental Arts Expert</td> <td>35 = Heart Condition</td> <td>80 = Medication Required</td> <td>60 = Allergic</td> </tr> <tr> <td>11 = Explosive Expertise</td> <td>35 = Alcoholic</td> <td>85 = Hemophilia</td> <td>20 = Known to abuse drugs</td> </tr> </table>												00 = Armed and Dangerous	25 = Escape Risk	45 = Epilepsy	01 = Other (Explain)	01 = Violent Tendencies	30 = Sexually Violent Predator	70 = Suicidal	90 = Diabetic	10 = Mental Arts Expert	35 = Heart Condition	80 = Medication Required	60 = Allergic	11 = Explosive Expertise	35 = Alcoholic	85 = Hemophilia	20 = Known to abuse drugs
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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.

- c The liver lacerations likely would have occurred within one or two days of I.E.'s presentment 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.
- d 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. Aris opined that the trauma would be equivalent to 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.
- e In Dr. Aris' opinion, an eleven-year-old child weighing approximately 80 pounds would not have been able to cause the extensive injuries seen on either I.E. or even the decedent, G.E., who had similar injuries. Liver and kidneys are internal organs, which takes a tremendous amount of force to physically damage.

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jearna Eason

Charge: Vol. 1st Dep. Murder-Felon; Murder (Convicted to CMV) (Ind)

10/17/20
ASSISTANT UNITED STATES ATTORNEY

- NCM APPROVED -

Form CDR(17)-1050

JGP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY of October 2020

Joseph H. Pelt
(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.:

DEFENDANT'S NAME: Ta'jeana JASON		NICKNAME:		ALIASES:		CCM: 20-03349		PMID:																	
SEX:	RACE:	DOB:	HGT:	WGT:	EYES:	HAIR:	COMPL:	SCARS, MARKS:	TATTOOS:																
Female	Black	8/19/1989	Unk	Unk	Brown	Black	Med	Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 451-1608																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																
CAUTIONS AND MEDICAL CONDITIONS (CMC) Select a valid CMC code below for wanted person when using the caution indicator.																									
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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. Artis, she stated that L.L. 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. Artis 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. Greens

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason


Charge 2011: First Deg. Murder; Felony Murder (Cruelty to Children)

10/17/20
ASSISTANT UNITED STATES ATTORNEY

—NOTICE APPROVED—

Form 5 (11-17)-1050

SUBSCRIBED AND SWORN BEFORE ME, THIS

22nd  October 20

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

Revision Date: 11/20/04

Exhibit C p. 025

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jenna EASON				NICKNAME:		ALIASES:		CCN: 20-053489	PDID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: 14A 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 691-1408																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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 wanted person when using the caution indicator.																									
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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 charge 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 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 T.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:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jenna Eason

Charge With: First Degree Murder Under 17 or 18

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

NOT APPROVED -

Name: LBI(17-100)

Revision Date: 11-29-08

Exhibit C p. 026

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jaune EASON				NICKNAME:		ALIASES:		CCN: 20-053489		FID:																	
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, 46 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 935 Division Ave NE, 46 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																		
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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 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.E. attended ECDC.

54. A teacher at ECDC, hereinafter referred to as W-1, 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-1 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 glove and the brother hit him in the eyes.

AFFIANT'S SIGNATURE:

X

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jaune Eason

Charge: 11th, First Deg. Murder; Felony Murder (Crucify to Children)

10/17/20
SIGNED: [Signature]
ATTORNEY UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd

DAY OF October

20 20

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

Form CRJ(17)-1020

- DCDC APPROVED -

[Signature]

Revision Date: 11-29-06

Exhibit C p. 027

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:		CCN: 20-053189		PDID																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WG: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																				
DEFENDANT'S HOME ADDRESS: LSA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																					
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																					
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																			
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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 30, 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 CFSA 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 bit him. The medical staff diagnosed him with a black eye (left periorbital ecchymosis - also described as racoon eyes) and some eye abrasions. The medical record notes further describe:

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge With: First Deg. Murder-Felony Murder (Crue to 1st Children)

[Signature]
ASSISTANT UNITED STATES ATTORNEY

- NCIC APPROVED -

Form CRI177-1050

JAP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20

[Signature]
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-16

Exhibit C p. 028

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.1

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:		ALIAS:		CCN: 20-053489		PHID:																	
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: 1KA 925 Division Ave NE, 46 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																		
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charles W. First Dep. Sec. Murder-Child Murder (Court to Children)

Anthony D. Greene 10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

Donette H. Roth
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD-17-1020

JHP

Revision Date: 11-29-06

Exhibit C p. 029

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jenna EASON				NICKNAME:				ALIASES:				CCN: 20-053489		FOID:															
SEX: Female	RACE: Black	DORB: 8/19/1989	LEGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																					
DEFENDANT'S HOME ADDRESS: LKA 915 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 491-1608																					
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:																					
LOCATION OF OFFENSE: 915 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 wanted person when using the caution indicator.																													
<table border="0"> <tr> <td>00 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>65 = Epilepsy</td> <td>91 = Other (Specify)</td> </tr> <tr> <td>03 = Violent Tendencies</td> <td>30 = Sexually Violent Predator</td> <td>70 = Suicidal</td> <td>96 = Diabetic</td> </tr> <tr> <td>10 = Mental Axis Expert</td> <td>50 = Heart Condition</td> <td>80 = Medication Required</td> <td>00 = Allergies</td> </tr> <tr> <td>15 = Explosive Expense</td> <td>55 = Alcoholic</td> <td>85 = Hospitalized</td> <td>20 = Known to abuse drugs</td> </tr> </table>														00 = Armed and Dangerous	25 = Escape Risk	65 = Epilepsy	91 = Other (Specify)	03 = Violent Tendencies	30 = Sexually Violent Predator	70 = Suicidal	96 = Diabetic	10 = Mental Axis Expert	50 = Heart Condition	80 = Medication Required	00 = Allergies	15 = Explosive Expense	55 = Alcoholic	85 = Hospitalized	20 = Known to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																													

61. Beginning October 16, 2019, Investigator JaNida Blake from MPD's YFSD 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 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 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 to 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 ears. 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 older children (the 3-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:

Ta'Jenna Eason

Charge: Voluntary Manslaughter (Counts 1a, Children)

10/1/2020
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 2020

Anthony D. Greene
(JUDGE) DEPUTY CLERK; SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

103C APP201990 -

Form CS017-1001

Revised Date: 01-09-06

Exhibit C p. 030

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:		ALIASES:		CCN: 20-053489	PDID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATOOS:																	
DEFENDANT'S HOME ADDRESS: 18A 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1068																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:35 hours																
CAUTION AND MEDICAL CONDITIONS (CMC) Select a valid CMC code below for wanted person when using the caution indicator.																									
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 65 = Epilepsy</td> <td><input type="checkbox"/> 01 = Other (Specify)</td> </tr> <tr> <td><input type="checkbox"/> 01 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 90 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Arts Expert</td> <td><input type="checkbox"/> 50 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 60 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 35 = Alcoholism</td> <td><input type="checkbox"/> 85 = Hemophilia</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>										<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 65 = Epilepsy	<input type="checkbox"/> 01 = Other (Specify)	<input type="checkbox"/> 01 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 90 = Diabetic	<input type="checkbox"/> 10 = Mental Arts Expert	<input type="checkbox"/> 50 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 60 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 35 = Alcoholism	<input type="checkbox"/> 85 = Hemophilia	<input type="checkbox"/> 20 = Known to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																									

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 lady from napa came. She said they are closing out the case. She said there is no sign of abuse."
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:
"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 saying I think that's real and [A.I.] not saying nothing."
- That text was followed by (eight) minutes later:
"All I said was that your son was saying I don't think that's fair that [A.I.] talking about to lay down and you not doing nothing about you right there."

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge(s): First Degree Murder (Counts to be filed)

11/17/20
 ASSISTANT UNITED STATES ATTORNEY

- (MTC/APP/01/20)

Form C (11/17/20)

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

Anthony D. Greene
 (JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
 DISTRICT OF COLUMBIA

Recreation Date: 1-1-2025

Exhibit C p. 031

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanne EASON				NICKNAME:				ALIASES:		CCN: 20-051489	PHID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LRA 933 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 933 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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 45 = Epilepsy</td> <td><input type="checkbox"/> 61 = Other (Specify)</td> </tr> <tr> <td><input type="checkbox"/> 05 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 80 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Illness</td> <td><input type="checkbox"/> 50 = Heart Condition</td> <td><input type="checkbox"/> 88 = Medication Required</td> <td><input type="checkbox"/> 60 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Susceptible</td> <td><input type="checkbox"/> 55 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophilia</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>												<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 45 = Epilepsy	<input type="checkbox"/> 61 = Other (Specify)	<input type="checkbox"/> 05 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 80 = Diabetic	<input type="checkbox"/> 10 = Mental Illness	<input type="checkbox"/> 50 = Heart Condition	<input type="checkbox"/> 88 = Medication Required	<input type="checkbox"/> 60 = Allergies	<input type="checkbox"/> 15 = Explosive Susceptible	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophilia	<input type="checkbox"/> 20 = Known to abuse drugs
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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 (J.E. and G.E.), who are in highchairs. 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 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 states "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:
"OMG to mock. [J.E.] has red marks on his nose and cheek."

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanne Eason

Charge: 18-111 (First Degree Murder) (Second Degree Murder) (Child)

10/17/20
ASSISTANT UNITED STATES ATTORNEY

Form CJ-17 (10/20) *JAP*

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY of October 20

Anthony D. Greene
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Date: 11-29-08

Exhibit C p. 032

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON	NICKNAME:	ALIASES:	CCN: 20-053489	POFD:
SEX: <input checked="" type="checkbox"/> FEMALE <input type="checkbox"/> MALE DOB: 8/19/1985 RACE: Black ETHNICITY: Black	HEIGHT: 5'6" WEIGHT: 135 lbs HAIR: Black EYES: Brown	SCARS/MARKS/TATTOOS: None TATTOOS: Unknown	TELEPHONE NUMBER: (202) 491-605	
DEFENDANT'S HOME ADDRESS: 16A 935 Division Ave NE, #6 Washington, DC 20019		TELEPHONE NUMBER:		
COMPLAINANT'S NAME: G.E.		TELEPHONE NUMBER:		
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019		DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: #25 hours
CAUTION AND SAFETY INSTRUCTIONS (READ) Select a valid CME code below for waived person when using the waiver facilities.				
<input type="checkbox"/> 00 - Armed and Dangerous <input type="checkbox"/> 01 - Violent Threats <input type="checkbox"/> 10 - Manual Arms Expert <input type="checkbox"/> 15 - Explosive Expert <input type="checkbox"/> 25 - Escape Risk <input type="checkbox"/> 30 - Sexually Violent Predator <input type="checkbox"/> 35 - Heart Condition <input type="checkbox"/> 35 - Alcoholic <input type="checkbox"/> 45 - Elderly <input type="checkbox"/> 50 - Suicidal <input type="checkbox"/> 60 - Medication Resistant <input type="checkbox"/> 65 - Hospitable <input type="checkbox"/> 90 - Other (if option) <input type="checkbox"/> 95 - Unstable <input type="checkbox"/> 99 - All other <input type="checkbox"/> 20 - Known to abuse drugs				
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."

EASON responded:

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

TURNER responded:

"Ok yes 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 [J.L.] (his 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 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:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge: 11th Dist. Reg. Murder-Felony Murder (Crivity to Children)

10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

Jonathan H. Pelt
(JUDGE) (DEPUTY CLERK) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Form CD-177-0020

-NOT APPROVED-

JHP

Revision Date: 11-29-08

Exhibit C p. 033

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jenna EASON				NICKNAME:		ALIASES:		CCN: 20-051439	POID:
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown	
DEFENDANT'S HOME ADDRESS: 11A 955 Division Ave NE, #6 Washington, DC 20019						TELEPHONE NUMBER: (202) 491-1608			
COMPLAINANT'S NAME: G.E.						TELEPHONE NUMBER:			
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019						DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:30 hours	
CALL 911 AND MEDICAL CONDITIONS (CMC): Select a valid CMC code below for nearest person whose role is the medical indicator.									
08 - Armed and Dangerous		35 - Toxic Risk		65 - Epilepsy		01 - Other (Specify)			
09 - Violent Tendencies		36 - Sexually Violent Predator		70 - Suicidal		02 - Dementia			
10 - Mental Area Exam		39 - Heart Condition		80 - Medication Required		03 - Allergies			
11 - Explosive Expertise		35 - Alcohol		85 - Hemophilia		04 - Known to abuse drugs			
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 YFSD 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 same time, EASON sent TURNER the following text:
- "I'm never leaving them with [G.E.] 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:

Anthony D. Greene

TO: WARRANT CLERK
PLEASE ISSUE A WARRANT FOR:

Ta'Jenna Eason

Charge: 11(b)(1)(A), 11(b)(1)(B), 11(b)(1)(C), 11(b)(1)(D), 11(b)(1)(E), 11(b)(1)(F), 11(b)(1)(G), 11(b)(1)(H), 11(b)(1)(I), 11(b)(1)(J), 11(b)(1)(K), 11(b)(1)(L), 11(b)(1)(M), 11(b)(1)(N), 11(b)(1)(O), 11(b)(1)(P), 11(b)(1)(Q), 11(b)(1)(R), 11(b)(1)(S), 11(b)(1)(T), 11(b)(1)(U), 11(b)(1)(V), 11(b)(1)(W), 11(b)(1)(X), 11(b)(1)(Y), 11(b)(1)(Z), 11(b)(1)(AA), 11(b)(1)(AB), 11(b)(1)(AC), 11(b)(1)(AD), 11(b)(1)(AE), 11(b)(1)(AF), 11(b)(1)(AG), 11(b)(1)(AH), 11(b)(1)(AI), 11(b)(1)(AJ), 11(b)(1)(AK), 11(b)(1)(AL), 11(b)(1)(AM), 11(b)(1)(AN), 11(b)(1)(AO), 11(b)(1)(AP), 11(b)(1)(AQ), 11(b)(1)(AR), 11(b)(1)(AS), 11(b)(1)(AT), 11(b)(1)(AU), 11(b)(1)(AV), 11(b)(1)(AW), 11(b)(1)(AX), 11(b)(1)(AY), 11(b)(1)(AZ), 11(b)(1)(BA), 11(b)(1)(BB), 11(b)(1)(BC), 11(b)(1)(BD), 11(b)(1)(BE), 11(b)(1)(BF), 11(b)(1)(BG), 11(b)(1)(BH), 11(b)(1)(BI), 11(b)(1)(BJ), 11(b)(1)(BK), 11(b)(1)(BL), 11(b)(1)(BM), 11(b)(1)(BN), 11(b)(1)(BO), 11(b)(1)(BP), 11(b)(1)(BQ), 11(b)(1)(BR), 11(b)(1)(BS), 11(b)(1)(BT), 11(b)(1)(BU), 11(b)(1)(BV), 11(b)(1)(BW), 11(b)(1)(BX), 11(b)(1)(BY), 11(b)(1)(BZ), 11(b)(1)(CA), 11(b)(1)(CB), 11(b)(1)(CC), 11(b)(1)(CD), 11(b)(1)(CE), 11(b)(1)(CF), 11(b)(1)(CG), 11(b)(1)(CH), 11(b)(1)(CI), 11(b)(1)(CJ), 11(b)(1)(CK), 11(b)(1)(CL), 11(b)(1)(CM), 11(b)(1)(CN), 11(b)(1)(CO), 11(b)(1)(CP), 11(b)(1)(CQ), 11(b)(1)(CR), 11(b)(1)(CS), 11(b)(1)(CT), 11(b)(1)(CU), 11(b)(1)(CV), 11(b)(1)(CW), 11(b)(1)(CX), 11(b)(1)(CY), 11(b)(1)(CZ), 11(b)(1)(DA), 11(b)(1)(DB), 11(b)(1)(DC), 11(b)(1)(DD), 11(b)(1)(DE), 11(b)(1)(DF), 11(b)(1)(DG), 11(b)(1)(DH), 11(b)(1)(DI), 11(b)(1)(DJ), 11(b)(1)(DK), 11(b)(1)(DL), 11(b)(1)(DM), 11(b)(1)(DN), 11(b)(1)(DO), 11(b)(1)(DP), 11(b)(1)(DQ), 11(b)(1)(DR), 11(b)(1)(DS), 11(b)(1)(DT), 11(b)(1)(DU), 11(b)(1)(DV), 11(b)(1)(DW), 11(b)(1)(DX), 11(b)(1)(DY), 11(b)(1)(DZ), 11(b)(1)(EA), 11(b)(1)(EB), 11(b)(1)(EC), 11(b)(1)(ED), 11(b)(1)(EE), 11(b)(1)(EF), 11(b)(1)(EG), 11(b)(1)(EH), 11(b)(1)(EI), 11(b)(1)(EJ), 11(b)(1)(EK), 11(b)(1)(EL), 11(b)(1)(EM), 11(b)(1)(EN), 11(b)(1)(EO), 11(b)(1)(EP), 11(b)(1)(EQ), 11(b)(1)(ER), 11(b)(1)(ES), 11(b)(1)(ET), 11(b)(1)(EU), 11(b)(1)(EV), 11(b)(1)(EW), 11(b)(1)(EX), 11(b)(1)(EY), 11(b)(1)(EZ), 11(b)(1)(FA), 11(b)(1)(FB), 11(b)(1)(FC), 11(b)(1)(FD), 11(b)(1)(FE), 11(b)(1)(FF), 11(b)(1)(FG), 11(b)(1)(FH), 11(b)(1)(FI), 11(b)(1)(FJ), 11(b)(1)(FK), 11(b)(1)(FL), 11(b)(1)(FM), 11(b)(1)(FN), 11(b)(1)(FO), 11(b)(1)(FP), 11(b)(1)(FQ), 11(b)(1)(FR), 11(b)(1)(FS), 11(b)(1)(FT), 11(b)(1)(FU), 11(b)(1)(FV), 11(b)(1)(FW), 11(b)(1)(FX), 11(b)(1)(FY), 11(b)(1)(FZ), 11(b)(1)(GA), 11(b)(1)(GB), 11(b)(1)(GC), 11(b)(1)(GD), 11(b)(1)(GE), 11(b)(1)(GF), 11(b)(1)(GG), 11(b)(1)(GH), 11(b)(1)(GI), 11(b)(1)(GJ), 11(b)(1)(GK), 11(b)(1)(GL), 11(b)(1)(GM), 11(b)(1)(GN), 11(b)(1)(GO), 11(b)(1)(GP), 11(b)(1)(GQ), 11(b)(1)(GR), 11(b)(1)(GS), 11(b)(1)(GT), 11(b)(1)(GU), 11(b)(1)(GV), 11(b)(1)(GW), 11(b)(1)(GX), 11(b)(1)(GY), 11(b)(1)(GZ), 11(b)(1)(HA), 11(b)(1)(HB), 11(b)(1)(HC), 11(b)(1)(HD), 11(b)(1)(HE), 11(b)(1)(HF), 11(b)(1)(HG), 11(b)(1)(HH), 11(b)(1)(HI), 11(b)(1)(HJ), 11(b)(1)(HK), 11(b)(1)(HL), 11(b)(1)(HM), 11(b)(1)(HN), 11(b)(1)(HO), 11(b)(1)(HP), 11(b)(1)(HQ), 11(b)(1)(HR), 11(b)(1)(HS), 11(b)(1)(HT), 11(b)(1)(HU), 11(b)(1)(HV), 11(b)(1)(HW), 11(b)(1)(HX), 11(b)(1)(HY), 11(b)(1)(HZ), 11(b)(1)(IA), 11(b)(1)(IB), 11(b)(1)(IC), 11(b)(1)(ID), 11(b)(1)(IE), 11(b)(1)(IF), 11(b)(1)(IG), 11(b)(1)(IH), 11(b)(1)(II), 11(b)(1)(IJ), 11(b)(1)(IK), 11(b)(1)(IL), 11(b)(1)(IM), 11(b)(1)(IN), 11(b)(1)(IO), 11(b)(1)(IP), 11(b)(1)(IQ), 11(b)(1)(IR), 11(b)(1)(IS), 11(b)(1)(IT), 11(b)(1)(IU), 11(b)(1)(IV), 11(b)(1)(IW), 11(b)(1)(IX), 11(b)(1)(IY), 11(b)(1)(IZ), 11(b)(1)(JA), 11(b)(1)(JB), 11(b)(1)(JC), 11(b)(1)(JD), 11(b)(1)(JE), 11(b)(1)(JF), 11(b)(1)(JG), 11(b)(1)(JH), 11(b)(1)(JI), 11(b)(1)(JJ), 11(b)(1)(JK), 11(b)(1)(JL), 11(b)(1)(JM), 11(b)(1)(JN), 11(b)(1)(JO), 11(b)(1)(JP), 11(b)(1)(JQ), 11(b)(1)(JR), 11(b)(1)(JS), 11(b)(1)(JT), 11(b)(1)(JU), 11(b)(1)(JV), 11(b)(1)(JW), 11(b)(1)(JX), 11(b)(1)(JY), 11(b)(1)(JZ), 11(b)(1)(KA), 11(b)(1)(KB), 11(b)(1)(KC), 11(b)(1)(KD), 11(b)(1)(KE), 11(b)(1)(KF), 11(b)(1)(KG), 11(b)(1)(KH), 11(b)(1)(KI), 11(b)(1)(KJ), 11(b)(1)(KK), 11(b)(1)(KL), 11(b)(1)(KM), 11(b)(1)(KN), 11(b)(1)(KO), 11(b)(1)(KP), 11(b)(1)(KQ), 11(b)(1)(KR), 11(b)(1)(KS), 11(b)(1)(KT), 11(b)(1)(KU), 11(b)(1)(KV), 11(b)(1)(KW), 11(b)(1)(KX), 11(b)(1)(KY), 11(b)(1)(KZ), 11(b)(1)(LA), 11(b)(1)(LB), 11(b)(1)(LC), 11(b)(1)(LD), 11(b)(1)(LE), 11(b)(1)(LF), 11(b)(1)(LG), 11(b)(1)(LH), 11(b)(1)(LI), 11(b)(1)(LJ), 11(b)(1)(LK), 11(b)(1)(LL), 11(b)(1)(LM), 11(b)(1)(LN), 11(b)(1)(LO), 11(b)(1)(LP), 11(b)(1)(LQ), 11(b)(1)(LR), 11(b)(1)(LS), 11(b)(1)(LT), 11(b)(1)(LU), 11(b)(1)(LV), 11(b)(1)(LW), 11(b)(1)(LX), 11(b)(1)(LY), 11(b)(1)(LZ), 11(b)(1)(MA), 11(b)(1)(MB), 11(b)(1)(MC), 11(b)(1)(MD), 11(b)(1)(ME), 11(b)(1)(MF), 11(b)(1)(MG), 11(b)(1)(MH), 11(b)(1)(MI), 11(b)(1)(MJ), 11(b)(1)(MK), 11(b)(1)(ML), 11(b)(1)(MM), 11(b)(1)(MN), 11(b)(1)(MO), 11(b)(1)(MP), 11(b)(1)(MQ), 11(b)(1)(MR), 11(b)(1)(MS), 11(b)(1)(MT), 11(b)(1)(MU), 11(b)(1)(MV), 11(b)(1)(MW), 11(b)(1)(MX), 11(b)(1)(MY), 11(b)(1)(MZ), 11(b)(1)(NA), 11(b)(1)(NB), 11(b)(1)(NC), 11(b)(1)(ND), 11(b)(1)(NE), 11(b)(1)(NF), 11(b)(1)(NG), 11(b)(1)(NH), 11(b)(1)(NI), 11(b)(1)(NJ), 11(b)(1)(NK), 11(b)(1)(NL), 11(b)(1)(NM), 11(b)(1)(NN), 11(b)(1)(NO), 11(b)(1)(NP), 11(b)(1)(NQ), 11(b)(1)(NR), 11(b)(1)(NS), 11(b)(1)(NT), 11(b)(1)(NU), 11(b)(1)(NV), 11(b)(1)(NW), 11(b)(1)(NX), 11(b)(1)(NY), 11(b)(1)(NZ), 11(b)(1)(OA), 11(b)(1)(OB), 11(b)(1)(OC), 11(b)(1)(OD), 11(b)(1)(OE), 11(b)(1)(OF), 11(b)(1)(OG), 11(b)(1)(OH), 11(b)(1)(OI), 11(b)(1)(OJ), 11(b)(1)(OK), 11(b)(1)(OL), 11(b)(1)(OM), 11(b)(1)(ON), 11(b)(1)(OO), 11(b)(1)(OP), 11(b)(1)(OQ), 11(b)(1)(OR), 11(b)(1)(OS), 11(b)(1)(OT), 11(b)(1)(OU), 11(b)(1)(OV), 11(b)(1)(OW), 11(b)(1)(OX), 11(b)(1)(OY), 11(b)(1)(OZ), 11(b)(1)(PA), 11(b)(1)(PB), 11(b)(1)(PC), 11(b)(1)(PD), 11(b)(1)(PE), 11(b)(1)(PF), 11(b)(1)(PG), 11(b)(1)(PH), 11(b)(1)(PI), 11(b)(1)(PJ), 11(b)(1)(PK), 11(b)(1)(PL), 11(b)(1)(PM), 11(b)(1)(PN), 11(b)(1)(PO), 11(b)(1)(PP), 11(b)(1)(PQ), 11(b)(1)(PR), 11(b)(1)(PS), 11(b)(1)(PT), 11(b)(1)(PU), 11(b)(1)(PV), 11(b)(1)(PW), 11(b)(1)(PX), 11(b)(1)(PY), 11(b)(1)(PZ), 11(b)(1)(QA), 11(b)(1)(QB), 11(b)(1)(QC), 11(b)(1)(QD), 11(b)(1)(QE), 11(b)(1)(QF), 11(b)(1)(QG), 11(b)(1)(QH), 11(b)(1)(QI), 11(b)(1)(QJ), 11(b)(1)(QK), 11(b)(1)(QL), 11(b)(1)(QM), 11(b)(1)(QN), 11(b)(1)(QO), 11(b)(1)(QP), 11(b)(1)(QQ), 11(b)(1)(QR), 11(b)(1)(QS), 11(b)(1)(QT), 11(b)(1)(QU), 11(b)(1)(QV), 11(b)(1)(QW), 11(b)(1)(QX), 11(b)(1)(QY), 11(b)(1)(QZ), 11(b)(1)(RA), 11(b)(1)(RB), 11(b)(1)(RC), 11(b)(1)(RD), 11(b)(1)(RE), 11(b)(1)(RF), 11(b)(1)(RG), 11(b)(1)(RH), 11(b)(1)(RI), 11(b)(1)(RJ), 11(b)(1)(RK), 11(b)(1)(RL), 11(b)(1)(RM), 11(b)(1)(RN), 11(b)(1)(RO), 11(b)(1)(RP), 11(b)(1)(RQ), 11(b)(1)(RR), 11(b)(1)(RS), 11(b)(1)(RT), 11(b)(1)(RU), 11(b)(1)(RV), 11(b)(1)(RW), 11(b)(1)(RX), 11(b)(1)(RY), 11(b)(1)(RZ), 11(b)(1)(SA), 11(b)(1)(SB), 11(b)(1)(SC), 11(b)(1)(SD), 11(b)(1)(SE), 11(b)(1)(SF), 11(b)(1)(SG), 11(b)(1)(SH), 11(b)(1)(SI), 11(b)(1)(SJ), 11(b)(1)(SK), 11(b)(1)(SL), 11(b)(1)(SM), 11(b)(1)(SN), 11(b)(1)(SO), 11(b)(1)(SP), 11(b)(1)(SQ), 11(b)(1)(SR), 11(b)(1)(SS), 11(b)(1)(ST), 11(b)(1)(SU), 11(b)(1)(SV), 11(b)(1)(SW), 11(b)(1)(SX), 11(b)(1)(SY), 11(b)(1)(SZ), 11(b)(1)(TA), 11(b)(1)(TB), 11(b)(1)(TC), 11(b)(1)(TD), 11(b)(1)(TE), 11(b)(1)(TF), 11(b)(1)(TG), 11(b)(1)(TH), 11(b)(1)(TI), 11(b)(1)(TJ), 11(b)(1)(TK), 11(b)(1)(TL), 11(b)(1)(TM), 11(b)(1)(TN), 11(b)(1)(TO), 11(b)(1)(TP), 11(b)(1)(TQ), 11(b)(1)(TR), 11(b)(1)(TS), 11(b)(1)(TT), 11(b)(1)(TU), 11(b)(1)(TV), 11(b)(1)(TW), 11(b)(1)(TX), 11(b)(1)(TY), 11(b)(1)(TZ), 11(b)(1)(UA), 11(b)(1)(UB), 11(b)(1)(UC), 11(b)(1)(UD), 11(b)(1)(UE), 11(b)(1)(UF), 11(b)(1)(UG), 11(b)(1)(UH), 11(b)(1)(UI), 11(b)(1)(UJ), 11(b)(1)(UK), 11(b)(1)(UL), 11(b)(1)(UM), 11(b)(1)(UN), 11(b)(1)(UO), 11(b)(1)(UP), 11(b)(1)(UQ), 11(b)(1)(UR), 11(b)(1)(US), 11(b)(1)(UT), 11(b)(1)(UU), 11(b)(1)(UV), 11(b)(1)(UW), 11(b)(1)(UX), 11(b)(1)(UY), 11(b)(1)(UZ), 11(b)(1)(VA), 11(b)(1)(VB), 11(b)(1)(VC), 11(b)(1)(VD), 11(b)(1)(VE), 11(b)(1)(VF), 11(b)(1)(VG), 11(b)(1)(VH), 11(b)(1)(VI), 11(b)(1)(VJ), 11(b)(1)(VK), 11(b)(1)(VL), 11(b)(1)(VM), 11(b)(1)(VN), 11(b)(1)(VO), 11(b)(1)(VP), 11(b)(1)(VQ), 11(b)(1)(VR), 11(b)(1)(VS), 11(b)(1)(VT), 11(b)(1)(VU), 11(b)(1)(VV), 11(b)(1)(VW), 11(b)(1)(VX), 11(b)(1)(VY), 11(b)(1)(VZ), 11(b)(1)(WA), 11(b)(1)(WB), 11(b)(1)(WC), 11(b)(1)(WD), 11(b)(1)(WE), 11(b)(1)(WF), 11(b)(1)(WG), 11(b)(1)(WH), 11(b)(1)(WI), 11(b)(1)(WJ), 11(b)(1)(WK), 11(b)(1)(WL), 11(b)(1)(WM), 11(b)(1)(WN), 11(b)(1)(WO), 11(b)(1)(WP), 11(b)(1)(WQ), 11(b)(1)(WR), 11(b)(1)(WS), 11(b)(1)(WT), 11(b)(1)(WU), 11(b)(1)(WV), 11(b)(1)(WW), 11(b)(1)(WX), 11(b)(1)(WY), 11(b)(1)(WZ), 11(b)(1)(XA), 11(b)(1)(XB), 11(b)(1)(XC), 11(b)(1)(XD), 11(b)(1)(XE), 11(b)(1)(XF), 11(b)(1)(XG), 11(b)(1)(XH), 11(b)(1)(XI), 11(b)(1)(XJ), 11(b)(1)(XK), 11(b)(1)(XL), 11(b)(1)(XM), 11(b)(1)(XN), 11(b)(1)(XO), 11(b)(1)(XP), 11(b)(1)(XQ), 11(b)(1)(XR), 11(b)(1)(XS), 11(b)(1)(XT), 11(b)(1)(XU), 11(b)(1)(XV), 11(b)(1)(XW), 11(b)(1)(XX), 11(b)(1)(XY), 11(b)(1)(XZ), 11(b)(1)(YA), 11(b)(1)(YB), 11(b)(1)(YC), 11(b)(1)(YD), 11(b)(1)(YE), 11(b)(1)(YF), 11(b)(1)(YG), 11(b)(1)(YH), 11(b)(1)(YI), 11(b)(1)(YJ), 11(b)(1)(YK), 11(b)(1)(YL), 11(b)(1)(YM), 11(b)(1)(YN), 11(b)(1)(YO), 11(b)(1)(YP), 11(b)(1)(YQ), 11(b)(1)(YR), 11(b)(1)(YS), 11(b)(1)(YT), 11(b)(1)(YU), 11(b)(1)(YV), 11(b)(1)(YW), 11(b)(1)(YX), 11(b)(1)(YY), 11(b)(1)(YZ), 11(b)(1)(ZA), 11(b)(1)(ZB), 11(b)(1)(ZC), 11(b)(1)(ZD), 11(b)(1)(ZE), 11(b)(1)(ZF), 11(b)(1)(ZG), 11(b)(1)(ZH), 11(b)(1)(ZI), 11(b)(1)(ZJ), 11(b)(1)(ZK), 11(b)(1)(ZL), 11(b)(1)(ZM), 11(b)(1)(ZN), 11(b)(1)(ZO), 11(b)(1)(ZP), 11(b)(1)(ZQ), 11(b)(1)(ZR), 11(b)(1)(ZS), 11(b)(1)(ZT), 11(b)(1)(ZU), 11(b)(1)(ZV), 11(b)(1)(ZW), 11(b)(1)(ZX), 11(b)(1)(ZY), 11(b)(1)(ZZ)

Form CD-100-1000

JAF APPB0990

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 2020

111 DEPUTY CLERK 91 PRIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 01-09-04

Exhibit C p. 034

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:				ALIASES:				CON: 20-053-889		PIDED:	
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown							
DEFENDANT'S HOME ADDRESS: 11KA 935 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 491-1608							
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:							
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 wanted person when using the caution indicator.															
36 = Armed and Dangerous				25 = Escape Risk				65 = Epilepsy				01 = Other (Explain)			
95 = Violent Tendencies				38 = Sexually Violent Predator				70 = Suicidal				90 = Diabetic			
10 = Mental Arts Expert				58 = 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:															

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-1 reported that during early February 2020, II noticed that the decedent had not been attending the educational facility. W-1 called EASON, inquiring about the status of the decedent. W-1 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.]

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge With: 1st-Deg. Murder-Felony Murder (Crucial to Children)

Ta'Jeanna Eason 10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME: THIS

22nd DAY OF October 20 20

Jonathan A. Pelt
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

- NOT APPROVED -

Form CJD(2) 0030

Revision Date: 11-09-06

Exhibit C p. 035

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:		ALIASES:		PCN: 20-053489	POD:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGHT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: 1KA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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 wanted person when using the caution indicator.																									
<table border="0"> <tr> <td>00 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>65 = Epilepsy</td> <td>01 = Other (Specify)</td> </tr> <tr> <td>05 = Violent Tendencies</td> <td>30 = Sexually Violent Predator</td> <td>70 = Suicidal</td> <td>50 = Diabetic</td> </tr> <tr> <td>10 = Manual Arts Expert</td> <td>35 = Heart Condition</td> <td>80 = Medication Required</td> <td>60 = Allergies</td> </tr> <tr> <td>15 = Explosive Expertise</td> <td>35 = Alcoholic</td> <td>85 = Hemophilia</td> <td>20 = Known to abuse drugs</td> </tr> </table>										00 = Armed and Dangerous	25 = Escape Risk	65 = Epilepsy	01 = Other (Specify)	05 = Violent Tendencies	30 = Sexually Violent Predator	70 = Suicidal	50 = Diabetic	10 = Manual Arts Expert	35 = Heart Condition	80 = Medication Required	60 = Allergies	15 = Explosive Expertise	35 = Alcoholic	85 = Hemophilia	20 = Known to abuse drugs
00 = Armed and Dangerous	25 = Escape Risk	65 = Epilepsy	01 = Other (Specify)																						
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15 = Explosive Expertise	35 = Alcoholic	85 = Hemophilia	20 = Known to abuse drugs																						
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																									

76. In March 2020, G.E. and L.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.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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge With: First Degree Murder-Exting. Murder (Crucity to Children)

[Signature] 04/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

[Signature]
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

- NCA APPROVED -

Form CD(17)-1030

Revision Date: 10-29-06

Exhibit C p. 036

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jeanna EASON				NICKNAME:		ALIASES:		CCN: 20-053409		PID:																	
SEX: Female	RACE: Black	DOB: 8/19/1989	HGT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: 1KA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1608																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 65 = Epilepsy</td> <td><input type="checkbox"/> 91 = Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 05 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 99 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Axis Expert</td> <td><input type="checkbox"/> 50 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 06 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Potential</td> <td><input type="checkbox"/> 55 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophiliac</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>												<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 65 = Epilepsy	<input type="checkbox"/> 91 = Other (Explain)	<input type="checkbox"/> 05 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 99 = Diabetic	<input type="checkbox"/> 10 = Mental Axis Expert	<input type="checkbox"/> 50 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 06 = Allergies	<input type="checkbox"/> 15 = Explosive Potential	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophiliac	<input type="checkbox"/> 20 = Known to abuse drugs
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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 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 I.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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jeanna Eason

Charge (s): First Deg. Murder; Felony Murder (Cruelty to Children)

10/19/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20

Jonathan A. Pelt
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD(C)-1020

- NCC APPROVED -

JAP

Revision Date: 11-09-06

Exhibit C p. 037

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Ta'Jemma EASON				NICKNAME:		ALIASES:		CCN: 20-053489	PDID:																
SEX: Female	RACE: Black	DOB: 8/19/1989	HT: Unk	WGT: Unk	EYES: Brown	HAIR: Black	COMPL: Med	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: 1KA 933 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 491-1603																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
LOCATION OF OFFENSE: 933 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 wanted person when using the caution indicator.																									
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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 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, PDID: 606-380) 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.

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Ta'Jemma Eason

Charge: 1st Degree Cruelty to Children, Felony Murder (Cruelty to Children)

Assistant UNITED STATES ATTORNEY

—NOCA APPROVED—

Form CR-17-1030

JHP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20

(JUDGE) (DEPUTY C. F.R.K.) SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revision Notice: 1-10-06

Exhibit C p. 038

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.
	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.
	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.
	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.]
	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.
	There is conflicting detail about a call/calls between EASON and TURNER during the apartment visit: <ol style="list-style-type: none"> 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

JHP

Exhibit C p. 039

APPENDIX A

12:40 p.m.	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.
	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.]
	EASON claimed her husband and oldest son, M.E., were at home babysitting G.E. and I.E. She claimed they left the kids at home because of Coronavirus.
1:00 p.m.	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.
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>I'm waiting for you</i>
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 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.]
	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 laid 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.

Anthony D. Greene

JAP

Exhibit C p. 040

APPENDIX A

	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 "high fived" TURNER. TURNER said he gave both G.E. and I.E. a tablet and he went to bed.
	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.]
7:00 p.m.	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.]
	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.
9:00-9:30 p.m.	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.
10:30 p.m.	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.

Anthony D. Greene *ADG*

10/17/20

Jd/P

Exhibit C p. 041

APPENDIX B

Calls on April 1, 2020

April 1, 2020	To/From	Duration
06:08:57am	TURNER to EASON	01:57
06:11:42am	TURNER to EASON	00:10
06:42:28am	TURNER to EASON	15:47
07:16:25am	TURNER to EASON	00:22
07:51:49am	TURNER to EASON	Not answered
07:52:01am	EASON to TURNER	00:16
08:23:08am	EASON to TURNER	Not answered
08:23:18am	EASON to TURNER	Not answered
08:23:37am	TURNER to EASON	00:03
08:23:43am	TURNER to EASON	00:04
08:23:50am	TURNER to EASON	00:03
08:24:04am	TURNER to EASON	00:03
08:24:11am	TURNER to EASON	00:03

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	03:12
09:31:05am	EASON to TURNER	00:00
09:31:11am	TURNER to EASON	00:04

Anthony D. Greene

10/17/20

JHP

Exhibit D p. 001

SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

2020 CRW 4706

CRIMINAL DIVISION

DCTN: _____

Lookup No: _____

Case No: _____

COMPLAINT

District of Columbia ss:

Defendant's Name: Antonio Dale Turner 606380 20053489
(First) (MI) (Last) (PDID) (CCNO)

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 wilfully 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 1101 (2001 ed.)**)

Co-Defendants:

Subscribed and sworn to before me this 22nd day of October, 2020
Jonathan H. Pittman
(Judge) (Deputy Clerk)

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

Jonathan H. Pittman
Judge - Superior Court of the District of Columbia

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: <u>[Signature]</u> 10/17/20			Fel. I <input checked="" type="checkbox"/> AFTC <input type="checkbox"/> Fel. II <input type="checkbox"/>

Exhibit D p. 002

2020 CRW 4706

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-053484	PDID: 606380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WG: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC, 20019							TELEPHONE NUMBER: (202) 332-1463																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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.																									
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 65 = Epilepsy</td> <td><input type="checkbox"/> 80 = Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 01 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Solitary</td> <td><input type="checkbox"/> 90 = Unstable</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Arts Expert</td> <td><input type="checkbox"/> 35 = Heart Condition</td> <td><input type="checkbox"/> 85 = Medication Required</td> <td><input type="checkbox"/> 60 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expense</td> <td><input type="checkbox"/> 35 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophiliac</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>										<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 65 = Epilepsy	<input type="checkbox"/> 80 = Other (Explain)	<input type="checkbox"/> 01 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Solitary	<input type="checkbox"/> 90 = Unstable	<input type="checkbox"/> 10 = Mental Arts Expert	<input type="checkbox"/> 35 = Heart Condition	<input type="checkbox"/> 85 = Medication Required	<input type="checkbox"/> 60 = Allergies	<input type="checkbox"/> 15 = Explosive Expense	<input type="checkbox"/> 35 = Alcoholic	<input type="checkbox"/> 85 = Hemophiliac	<input type="checkbox"/> 20 = Known to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																									

The evidence and information contained in this affidavit describes how defendants Ta'Janna 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 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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

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

Anthony D. Greene 10/17/20
ASSISTANT UNITED STATES ATTORNEY

- NOIC APPROVER -

Form CM-125-1050

JAP

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

Shirley H. Pelt
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-19-06

Exhibit D p. 003

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-052-489	PMID: 606180																
SEX: Male	RACE: Black	DOB: 5/23/1992	HEIGHT: 5'7"	WEIGHT: 185	EYES: Brown	HAIR: Black	COMPL.: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, 46 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1563																		
COMPLAINANT'S NAME: G.I.E.							TELEPHONE NUMBER:																		
LOCATION OF OFFENSE: 935 Division Ave NE, 46 Washington, D.C., 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 3:25 hours																
CAUTION AND MEDICAL CONDITIONS (CMG) Select a valid CMG code below for wanted person when using the caution indicator.																									
<table border="0"> <tr> <td>00 - Armed and Dangerous</td> <td>25 - Escape Risk</td> <td>45 - Epilepsy</td> <td>01 - Other (Explain)</td> </tr> <tr> <td>05 - Violent Tendencies</td> <td>30 - Sexually Violent Predator</td> <td>20 - Suicidal</td> <td>90 - Diabetic</td> </tr> <tr> <td>10 - Martial Arts Expert</td> <td>50 - Heart Condition</td> <td>95 - Medication Required</td> <td>60 - Allergies</td> </tr> <tr> <td>15 - Explosive Expertise</td> <td>55 - Alcoholic</td> <td>85 - Hemophilia</td> <td>20 - Known to abuse drugs</td> </tr> </table>										00 - Armed and Dangerous	25 - Escape Risk	45 - Epilepsy	01 - Other (Explain)	05 - Violent Tendencies	30 - Sexually Violent Predator	20 - Suicidal	90 - Diabetic	10 - Martial Arts Expert	50 - Heart Condition	95 - Medication Required	60 - Allergies	15 - Explosive Expertise	55 - Alcoholic	85 - Hemophilia	20 - Known to abuse drugs
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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 livor 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.

- The decedent has been identified as G.I.E., with a date of birth of December 12, 2017.
- The child's mother, Ta'jeanna EASON, DOB: 08/19/1989, told first responders that she last saw the child between 11:00 p.m. and 11:00 p.m. (the previous night) and stated that her husband left for work at 5:30 a.m.
- 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.

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: 11-21-2018: Murder, Felony Murder (Crucifix to Child (cc))

10/17/20
ASSISTANT UNITED STATES ATTORNEY

- NICA APPROVED -

Form CDE-1000

JMP

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October 20 20
Janette H. Rife
(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

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CON: 29-053490		PDID: 606280																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HEIGHT: 5'7"	WEIGHT: 185	EYES: Brown	HAIR: Black	COMPL.: Dark	SCARS MARKS TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: L.A. 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
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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 I.E.'s head. She made no mention of any other injuries and stated I.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 I.E.'s forehead and asked if that had always been there. EASON replied no. Officer Alexander then observed I.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 I.E. beside her on the couch and yelled out, "My son does not act 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 a head injury. I.E. appeared groggy, but started to respond and cry a little. EASON then had I.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 (YFS) Detective Jerry Afari that D.C. Fire/EMS Paramedic O'Byrne opined on the

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: First-Degree Murder (Crimes to Children)

Anthony D. Greene 10/17/20
ASSISTANT UNITED STATES ATTORNEY

NOTICE APPROVED -

Form CM-171-1000

JAP

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October 2020
Jonathan H. [Signature]
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-06

Exhibit D p. 005

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-053489	PDID 606786																
SEX: Male	RACE: Black	DOB: 3/21/1992	HGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS MARKS: Unknown	FATIGUE:																
DEFENDANT'S HOME ADDRESS: 1NA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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 injured person when using the caution indicator.																									
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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 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, OCMF 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 thymus gland; acute abdominal injuries

AFFIANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: First Degree Murder; Felony Murder (Juvenile to Children)

10/17/20
ASSISTANT UNITED STATES ATTORNEY

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

[Signature]
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

- NOT APPROVED -

Form C34 771-1055

Revision Date: 11-09-05

Exhibit D p. 006

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-033489	PID#: 606380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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 wanted person when using the caution indicator.																									
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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 with associated subscalp 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 MedStat
8. Georgetown University Hospital Pathology Consultation Reports

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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: First-Deg. Murder; Felony Murder (Child in a Child's Room)

Anthony D. Greene
10/17/20
ASSISTANT UNITED STATES ATTORNEY

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

Anthony D. Greene
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD-171-1050
-- JALP --

Revision Date: 11-29-06

Exhibit D p. 007

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale Turner				NICKNAME:		ALIASES:		CCN: 20-053489	PUID: 006380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WGT: 155	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: 1 KA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 132-1663																		
COMPLAINANT'S NAME: G.I.							TELEPHONE NUMBER:																		
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 (LAW): Select a valid CMC code below for wanted person when using the caution indicator.																									
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																									

of the corpus callosum (associated with trauma)

b. Mild vitreous hemorrhage, bilateral

c. No intratentorial or optic nerve sheath hemorrhages

Trauma

- Abrasions and contusions
- Bilateral rib fractures (These 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)
- Posterior thymus hemorrhage
- Posterior epicardial and proximal vena cava hemorrhages. (In Dr. Breland's opinion, this type of injury takes a tremendous amount of force)
- Hemopericardium (6 milliliters of blood inside the pericardial sac)
- Hemoperitoneum 150 millimeters of (blood inside abdominal cavity)
- Left retroperitoneal hemorrhage (soft tissue back of abdomen)
- Liver lacerations with subcapsular hemorrhages
- Left kidney laceration
- Peripancreatic and adrenal capsular hemorrhages
- Left adrenal hematoma

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

22nd

Charles Wilson et al. Re: Murder of Officer Zhanier (Couple to Children)

10/17/20
ASSISTANT UNITED STATES ATTORNEY

~ NOT APPROVED ~

Form CD-159-10/20

JHP

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October 20 20
Janette H. Pelt
(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. 1

DEFENDANT'S NAME: Aminin Dale TURNER		NICKNAME:		ALIASES:		CCN: 20-053429		PDID: 606580																	
SEX: RACE: DOB: HTG: WGT: EYES: HAIR:		COMPL: TATTOOS:		SCARS, MARKS, TATTOOS:																					
Male Black 5/23/1990 5'7 185 Brown Black		Dark Unknown																							
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019				TELEPHONE NUMBER: (202) 332-1663																					
COMPLAINANT'S NAME: G.E.				TELEPHONE NUMBER:																					
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019				DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																			
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																									

12. Bilateral spermatic cord hemorrhages
13. Bowel contusions

12. Dr. Ireland noted there were striations or linear depressions on the back of G.E.'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.E. 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 supple 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. Ireland 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. Ireland's opinion, the main cause of death was the significant head and abdominal trauma.

BACKGROUND AND INITIAL MPD INVESTIGATION

13. **TA'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

AFFILANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge With: First Deg. Murder-Felony Murder (Cruelty to Children)

10/17/2001
ASSISTANT UNITED STATES ATTORNEY

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

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

From CD127-1020

Revision Date: 11-29-06

Exhibit D p. 009

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:				ALIASES:		CCN: 20-053489	PDID: 606380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: 1333 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1563																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 55 = Fugitive</td> <td><input type="checkbox"/> 85 = Other (Specify)</td> </tr> <tr> <td><input type="checkbox"/> 05 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 90 = Fugitive</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Arts Expert</td> <td><input type="checkbox"/> 40 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 95 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 50 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophiliac</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>												<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 55 = Fugitive	<input type="checkbox"/> 85 = Other (Specify)	<input type="checkbox"/> 05 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 90 = Fugitive	<input type="checkbox"/> 10 = Mental Arts Expert	<input type="checkbox"/> 40 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 95 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 50 = Alcoholic	<input type="checkbox"/> 85 = Hemophiliac	<input type="checkbox"/> 20 = Known to abuse drugs
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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 Chanel 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.

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: *First Degree Murder; Kidnap; Murder (Crucial to Children)*

ASSISTANT UNITED STATES ATTORNEY

22nd SUBSCRIBED AND SWORN BEFORE ME THIS

20th DAY OF October 2020

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

Form CCR-17-102a *JAP*

Revision Date: 11-29-05

Exhibit D p. 010

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:				ALIASES:		CCN: 20-053489	PDID: 606380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WG: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: 1,6 A 915 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td><input type="checkbox"/> 00 - Armed and Dangerous</td> <td><input type="checkbox"/> 35 - Escape Risk</td> <td><input type="checkbox"/> 65 - Epilepsy</td> <td><input type="checkbox"/> 91 - Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 05 - Violent Tendencies</td> <td><input type="checkbox"/> 40 - Sexually Violent Predator</td> <td><input type="checkbox"/> 70 - Suihda</td> <td><input type="checkbox"/> 94 - Tuberc</td> </tr> <tr> <td><input type="checkbox"/> 10 - Martial Arts Expert</td> <td><input type="checkbox"/> 50 - Heart Condition</td> <td><input type="checkbox"/> 80 - Medication Required</td> <td><input type="checkbox"/> 96 - Allergy</td> </tr> <tr> <td><input type="checkbox"/> 15 - Explosive Expert</td> <td><input type="checkbox"/> 55 - Alcoholie</td> <td><input type="checkbox"/> 85 - Hemophilic</td> <td><input type="checkbox"/> 20 - Known in street drugs</td> </tr> </table>												<input type="checkbox"/> 00 - Armed and Dangerous	<input type="checkbox"/> 35 - Escape Risk	<input type="checkbox"/> 65 - Epilepsy	<input type="checkbox"/> 91 - Other (Explain)	<input type="checkbox"/> 05 - Violent Tendencies	<input type="checkbox"/> 40 - Sexually Violent Predator	<input type="checkbox"/> 70 - Suihda	<input type="checkbox"/> 94 - Tuberc	<input type="checkbox"/> 10 - Martial Arts Expert	<input type="checkbox"/> 50 - Heart Condition	<input type="checkbox"/> 80 - Medication Required	<input type="checkbox"/> 96 - Allergy	<input type="checkbox"/> 15 - Explosive Expert	<input type="checkbox"/> 55 - Alcoholie	<input type="checkbox"/> 85 - Hemophilic	<input type="checkbox"/> 20 - Known in street drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

17. On April 1, 2020, D.C. Child and Family Services Agency (CFSA) began a joint investigation with MPD regarding G.E.'s death. As a result, later in the day on April 1, CFSA 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), hemothorax 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 older injuries. M.E. disclosed to the CNMC Emergency Room physician that Antonio [TURNER] 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 cold. 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 get up in the middle of the

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charged With: First Degree Murder-Pedona Murder (Travel to Children)

10/17/20
ASSISTANT UNITED STATES ATTORNEY

- NOCA APPROVED -

Form CM 175-1050

JHP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

Donette A. Pelt
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revised on Date: 10-29-05

Exhibit D p. 011

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-053489		PDID: 606380																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS MARKS TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC, 20019							TELEPHONE NUMBER: (202) 332-1663																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

night to change his siblings' diapers and, if in the morning the children's diapers were wet, he would get beaten. M.E. stated that his mother 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 EASON'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, YFSD Detective Alari told your affiant that while M.E. was being screened by the GMMC medical staff, M.E. disclosed that his step father Antonio [TURNER], his 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, EASON was informed by a CFSA 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 CFSA.

22. As indicated above, at the time of G.E.'s death, EASON 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:

Antonio Dale Turner

Charge: *First Degree Murder* (County is Children)

ASSISTANT UNITED STATES ATTORNEY

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

Jonathan H. Pelt
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

-- NCIC APPROVED --

Form CD-177-1020

Revision Date: 11-29-05

JAP

Exhibit D p. 012

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-053489		PID#: 006180																	
SEX: Male	RACE: Black	DOB: 3/23/1992	HGT: 5'7	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

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 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 the bruises on G.E. after she met TURNER. EASON stated that she initially thought TURNER was responsible for the injuries, but then surmised 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 bruising to G.E., she and TURNER questioned M.E. about how G.E. was injured. EASON reported that

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: 1st Degree Murder (Killing Murder (Crucial to Children))

Anthony D. Greene
10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 2020

Jonathan H. Bell
(JUDGE (DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form C'DU-17-000

JEP

Revision Date: 11-29-2018

Exhibit D p. 013

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME Antonio Dale TURNER				NICKNAME		ALIASES		CCN 20-051489	PDID 606380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HEIGHT: 5'7"	WEIGHT: 185	EYES: Brown	HAIR: Black	COMPL. Dark	SCARS, MARKS, TATTOOS Unknown																	
DEFENDANT'S HOME ADDRESS LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER (202) 332-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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 wanted person when using the caution indicator.																									
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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 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:

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: First Degree Murder-Police Murder (Crucial to Children)

90/13/20
ASSISTANT UNITED STATES ATTORNEY

--NCR APPROVED--

Form CD-17-1009

JMP

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

Jonathan H. Bell
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

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

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-053-089	PDID: 606380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: 14KA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 232-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
LOCATION OF OFFENSE: 915 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																
CAUTION AND MEDICAL CONDITIONS (C.M.C.) Select a valid CMC code below for wanted persons when using the caution indicator.																									
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 45 = Epilepsy</td> <td><input type="checkbox"/> 91 = Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 05 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 90 = Diabetes</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Inst. Expert</td> <td><input type="checkbox"/> 50 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 95 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 55 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophilia</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>										<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 45 = Epilepsy	<input type="checkbox"/> 91 = Other (Explain)	<input type="checkbox"/> 05 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 90 = Diabetes	<input type="checkbox"/> 10 = Mental Inst. Expert	<input type="checkbox"/> 50 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 95 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophilia	<input type="checkbox"/> 20 = Known to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																									

"So I beat his ass. Yes, I did. I didn't like fuck him up to the point where he - you know, 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 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 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 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 "screaky" 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.

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge(s) of the First Degree Murder-Felony Murder (Cruelty to Children)

Anthony D. Greene 10/17/20
ASSISTANT UNITED STATES ATTORNEY

-NOC APPROVED-

Form CH-17-109e

JAP

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

Janet H. Pelt
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revised Date: 11-29-06

Exhibit D p. 015

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-03485	PRD: 616188																
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 132-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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 wanted person when using the caution indicator.																									
<table border="0"> <tr> <td>00 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>65 = Epilepsy</td> <td>01 = Other (Explain)</td> </tr> <tr> <td>05 = Violent Tendencies</td> <td>30 = Sexually Violent Predator</td> <td>70 = Schizoid</td> <td>10 = Diabetic</td> </tr> <tr> <td>10 = Mental Axis Exposed</td> <td>50 = Heart Condition</td> <td>80 = Medication Required</td> <td>20 = Allergies</td> </tr> <tr> <td>15 = Explosive Susceptible</td> <td>55 = Alcoholism</td> <td>85 = Hemophilia</td> <td>30 = Known to Abuse Drugs</td> </tr> </table>										00 = Armed and Dangerous	25 = Escape Risk	65 = Epilepsy	01 = Other (Explain)	05 = Violent Tendencies	30 = Sexually Violent Predator	70 = Schizoid	10 = Diabetic	10 = Mental Axis Exposed	50 = Heart Condition	80 = Medication Required	20 = Allergies	15 = Explosive Susceptible	55 = Alcoholism	85 = Hemophilia	30 = Known to Abuse Drugs
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15 = Explosive Susceptible	55 = Alcoholism	85 = Hemophilia	30 = Known to Abuse Drugs																						
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 "pop his hands, pop his legs, or just say "look little boy don't do that." EASON added that she didn't really discipline G.E. or I.F. because they were small. She said, "If they do get hit, it's like a pop or a pluck 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 Chanel Howard and George Taylor at MPD's Sixth District Station. Later that same day, he was interviewed by your affiant and MPD Detective David Dalcour 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 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 I.F. and two-year old G.E. in the care of 11 year old V.L. 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 accompanied to

AFFIANT'S SIGNATURE:

Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Cheryl A. [Signature] Chief, District of Columbia Superior Court (Court of the District)

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October 20
[Signature]
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CD-173-1002

BY: APPROVED -

JAP

Revision Date: 11-09-00

Exhibit D p. 016

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CC#: 20-053489		FIND: 666380	
SEX: Male	RACE: Black	DOB: 5/23/1952	HTGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATOOS: 1 scar on			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:				
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 wanted person when using the caution indicator.											
<input type="checkbox"/> 09 = Armed and Dangerous <input type="checkbox"/> 27 = Escape Risk <input type="checkbox"/> 45 = Epilepsy <input type="checkbox"/> 01 = Other (Specify) <input type="checkbox"/> 05 = Violent Tendencies <input type="checkbox"/> 39 = Sexually Violent Predator <input type="checkbox"/> 70 = Suicidal <input type="checkbox"/> 50 = Diabetic <input type="checkbox"/> 10 = Mental Arts Expert <input type="checkbox"/> 50 = Heart Condition <input type="checkbox"/> 40 = Medication Required <input type="checkbox"/> 60 = Allergies <input type="checkbox"/> 15 = Explosive Expertise <input type="checkbox"/> 85 = Alcoholic <input type="checkbox"/> 85 = Hemiparesis <input type="checkbox"/> 20 = Known to abuse drugs											
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.E.). TURNER said his weight bar (which he described as a skinny ten pound metal bar) was on the sofa next to the decedent. Your affiant 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 smacked the decedent's hand 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 I.E. holding his head. TURNER did not attempt to get any medical assistance for I.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 some anacid 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.E. 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:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge(s): 1st Degree Murder; Felony Murder 1 Counts to Children

Michael A. ... 04/07/20
ASSISTANT UNITED STATES ATTORNEY

- NCIC APPROVED -

Form CD(19)-1000

JMP

22nd SUBSCRIBED AND SWORN BEFORE ME THIS

DAY OF October 20 20

Joseph H. Bell
(JUDGE) DEPUTY CLERK, SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revised Date: 11-29-06

Exhibit D p. 017

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN 20-051489		PDID 606380	
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS/MARKS/TATTOOS Unknown			
DEFENDANT'S HOME ADDRESS: LAA 915 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 313-1663				
COMPLAINANT'S NAME: G.F.							TELEPHONE NUMBER:				
LOCATION OF OFFENSE: 925 Division Ave NE, 46 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 wanted person when using the caution indicator.											
<input type="checkbox"/> 01 = Armed and Dangerous <input type="checkbox"/> 25 = Escape Risk <input type="checkbox"/> 65 = Epilepsy <input type="checkbox"/> 81 = Other (Explain) <input type="checkbox"/> 02 = Violent Tendencies <input type="checkbox"/> 30 = Sexually Violent Predator <input type="checkbox"/> 70 = Suicidal <input type="checkbox"/> 89 = Diabetic <input type="checkbox"/> 10 = Mental Arts Expert <input type="checkbox"/> 50 = Heart Condition <input type="checkbox"/> 83 = Medication Required <input type="checkbox"/> 90 = Allergies <input type="checkbox"/> 15 = Explosive Expertise <input type="checkbox"/> 35 = Alcoholic <input type="checkbox"/> 85 = Homeless <input type="checkbox"/> 70 = Known to state drugs											
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:											

work and that later in the morning, he received a call from EASON saying that G.F. 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 EASON 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:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: 1st Degree Murder, Felony Murder, Consp. to Child Porn

10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

Linnette A. Pelt
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CJD-17-009 NCIC APPROVED

JAP

Revision Date: 11 Sep 08

Exhibit D p. 018

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-051489		PENN: 606380																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HTGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS Unknown																			
DEPENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER (202) 332-1563																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td>- 01 = Armed and Dangerous</td> <td>- 25 = Escape Risk</td> <td>- 55 = Epilepsy</td> <td>- 01 = Other (daytime)</td> </tr> <tr> <td>- 02 = Water Tendencies</td> <td>- 30 = Sexually Violent Predator</td> <td>- 70 = Suicide</td> <td>- 95 = Diabetic</td> </tr> <tr> <td>- 10 = Mental Arts Expert</td> <td>- 50 = Heart Condition</td> <td>- 80 = Medication Required</td> <td>- 05 = Allergies</td> </tr> <tr> <td>- 15 = Daphnetic Expertise</td> <td>- 55 = Alcoholic</td> <td>- 85 = Hemophiliac</td> <td>- 20 = Known to abuse drugs</td> </tr> </table>												- 01 = Armed and Dangerous	- 25 = Escape Risk	- 55 = Epilepsy	- 01 = Other (daytime)	- 02 = Water Tendencies	- 30 = Sexually Violent Predator	- 70 = Suicide	- 95 = Diabetic	- 10 = Mental Arts Expert	- 50 = Heart Condition	- 80 = Medication Required	- 05 = Allergies	- 15 = Daphnetic Expertise	- 55 = Alcoholic	- 85 = Hemophiliac	- 20 = Known to abuse drugs
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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 hits them too rough. 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 pampers down and pop them with a belt." [NOTE: There were linear marks on I.E. that were consistent with being hit with a belt].

39. During the later interview on April 1, 2020, conducted by your affiant and Detective Dalencour, 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 seized TURNER's cellular telephone device and prior to concluding the interview, received written consent from TURNER to forensically examine and process his cellular telephone for evidence.

INTERVIEWS of M.E.

40. On scene, M.E. spoke to Officer Pogle and stated: "I didn't do anything, everyone was sleeping. Nothing happened, I don't know what happened."

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: *First Time Rape, 2nd Degree Murder (Crews to Children)*

[Signature] 04/01/20
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

Form CM-123 (1/18)

[Signature]
NOT APPROVED

Revision Date: 11-29-05

Exhibit D p. 019

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale Turner				NICKNAME:		ALIASES:		CCN: 20-053489		PDID: 666380																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HEIGHT: 5'7"	WEIGHT: 185	EYES: Brown	HAIR: Black	COMPL.: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC, 20019							TELEPHONE NUMBER: (202) 132-1963																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:23 hours																		
CAUTION AND MEDICAL CONDITIONS (CMC) Select a valid CMC code below for wanted person when using the caution indicator.																											
<table border="0"> <tr> <td>- 00 - Armed and Dangerous</td> <td>- 25 - Escape Risk</td> <td>- 95 - Lethal</td> <td>- 60 - Other (Explain)</td> </tr> <tr> <td>- 01 - Violent Tendencies</td> <td>- 29 - Sexually Violent Predator</td> <td>- 70 - Suicidal</td> <td>- 90 - Destructive</td> </tr> <tr> <td>- 10 - Martial Arts Expert</td> <td>- 30 - Heart Condition</td> <td>- 80 - Medication Required</td> <td>- 99 - Other</td> </tr> <tr> <td>- 15 - Explosive Expertise</td> <td>- 35 - Alcoholic</td> <td>- 85 - Homicidal</td> <td>- 20 - Known to abuse drugs</td> </tr> </table>												- 00 - Armed and Dangerous	- 25 - Escape Risk	- 95 - Lethal	- 60 - Other (Explain)	- 01 - Violent Tendencies	- 29 - Sexually Violent Predator	- 70 - Suicidal	- 90 - Destructive	- 10 - Martial Arts Expert	- 30 - Heart Condition	- 80 - Medication Required	- 99 - Other	- 15 - Explosive Expertise	- 35 - Alcoholic	- 85 - Homicidal	- 20 - Known to abuse drugs
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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 left 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 "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 he 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 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:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charged with: 1st Degree Murder, 2nd Degree Murder, Cruelty to Children

10/17/20
ASSISTANT UNITED STATES ATTORNEY

-- NOCA APPROVED --

Form CJD(7)-1056 Jg/P

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20

James H. Roth
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Rebillion Date: 11-29-05

Exhibit D p. 020

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale Turner				NICKNAME:		ALIASES:		CCN: 20-053489	PRID: 606180																
SEX: Male	RACE: Black	D.O.B.: 5/23/1992	HEIGHT: 5'7"	WEIGHT: 185	EYES: Brown	HAIR: Black	COMPL.: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC, 20019							TELEPHONE NUMBER: (202) 333-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																
CAUTIONS AND MEDICAL CONDITIONS (CMC) Select a valid CMC code below for wanted person when using the caution indicator.																									
<table border="0"> <tr> <td><input type="checkbox"/> 00 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 05 = Epilepsy</td> <td><input type="checkbox"/> 01 = Other (Specify)</td> </tr> <tr> <td><input type="checkbox"/> 01 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicidal</td> <td><input type="checkbox"/> 60 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Arts Expert</td> <td><input type="checkbox"/> 40 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 40 = Allergic</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 35 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophilic</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>										<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 05 = Epilepsy	<input type="checkbox"/> 01 = Other (Specify)	<input type="checkbox"/> 01 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicidal	<input type="checkbox"/> 60 = Diabetic	<input type="checkbox"/> 10 = Mental Arts Expert	<input type="checkbox"/> 40 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 40 = Allergic	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 35 = Alcoholic	<input type="checkbox"/> 85 = Hemophilic	<input type="checkbox"/> 20 = Known to abuse drugs
<input type="checkbox"/> 00 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 05 = Epilepsy	<input type="checkbox"/> 01 = Other (Specify)																						
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<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 35 = Alcoholic	<input type="checkbox"/> 85 = Hemophilic	<input type="checkbox"/> 20 = Known to abuse drugs																						
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																									

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.

- o He felt safe at the home of his new foster parent.
- o When asked if he felt safe at his home (935 Division Avenue NE, Apartment 6) with his mother and step father Antonio [TURNER], he said no and said it felt like a "death trap."
- o He usually gets blamed for injuries to his younger siblings because he's usually with them.
- o His mother didn't realize that "the marks and beating rampage" started when Antonio [TURNER] came around.
- o Antonio [TURNER] would beat G.E. and I.E. when his mother was either not around or not in position to hear the abuse.
- o Once his mother observed the injuries to his siblings, she would blame M.E. for their injuries.
- o The last assault on G.E. and I.E. took place a few days prior to when his mother [EASON] and Antonio

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: *1st Degree Murder-Kidney Murder (Crucially to Children)*

10/17/20
ASSISTANT UNITED STATES ATTORNEY

Form CD-173-1059

NOT APPROVED -

JAP

SUBSCRIBED AND SWORN BEFORE ME THIS
22nd DAY OF October 20 20
[Signature]
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Dates: 11-09-06

Exhibit D p. 021

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-03489		PHID: 606180																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HTG: 5'7"	WEI: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LSA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1463																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: # 25 hours																		
CAUTION AND MEDICAL CONDITIONS (C/MC) Select a valid CMC code below for wanted person when using the caution indicator.																											
<table border="0"> <tr> <td><input type="checkbox"/> 01 = Armed and Dangerous</td> <td><input type="checkbox"/> 25 = Escape Risk</td> <td><input type="checkbox"/> 45 = Lethal</td> <td><input type="checkbox"/> 65 = Other (Specify)</td> </tr> <tr> <td><input type="checkbox"/> 02 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 50 = Suicidal</td> <td><input type="checkbox"/> 70 = Dumb</td> </tr> <tr> <td><input type="checkbox"/> 10 = Martial Arts Expert</td> <td><input type="checkbox"/> 40 = Heart Condition</td> <td><input type="checkbox"/> 60 = Medication Required</td> <td><input type="checkbox"/> 80 = Allergic</td> </tr> <tr> <td><input type="checkbox"/> 15 = Duplicative Expertise</td> <td><input type="checkbox"/> 55 = Alcoholic</td> <td><input type="checkbox"/> 85 = Hemophilia</td> <td><input type="checkbox"/> 90 = Susceptible to abuse drugs</td> </tr> </table>												<input type="checkbox"/> 01 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 45 = Lethal	<input type="checkbox"/> 65 = Other (Specify)	<input type="checkbox"/> 02 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 50 = Suicidal	<input type="checkbox"/> 70 = Dumb	<input type="checkbox"/> 10 = Martial Arts Expert	<input type="checkbox"/> 40 = Heart Condition	<input type="checkbox"/> 60 = Medication Required	<input type="checkbox"/> 80 = Allergic	<input type="checkbox"/> 15 = Duplicative Expertise	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophilia	<input type="checkbox"/> 90 = Susceptible to abuse drugs
<input type="checkbox"/> 01 = Armed and Dangerous	<input type="checkbox"/> 25 = Escape Risk	<input type="checkbox"/> 45 = Lethal	<input type="checkbox"/> 65 = Other (Specify)																								
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<input type="checkbox"/> 15 = Duplicative Expertise	<input type="checkbox"/> 55 = Alcoholic	<input type="checkbox"/> 85 = Hemophilia	<input type="checkbox"/> 90 = Susceptible to abuse drugs																								
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 he heard slaps and his brother started to cry before Antonio [TURNER] told them to "SHUT UP, SHUT UP!"

- He looked up a video on YouTube that pertained to 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 G.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:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: 1st Degree Murder-Felony Murder (Crucial to Children)

10/1/20
ASSISTANT UNITED STATES ATTORNEY

Form CJD-17-0000

JMP

22nd DAY OF October 2020

Jonathan H. Bell
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE DISTRICT OF COLUMBIA

Revised Date: 11-29-06

Exhibit D p. 022

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER						NICKNAME:		ALIASES:		CCN: 20-053489	PEID: 606390																
SEX: Male	RACE: Black	DOB: 5/23/1992	HT: 5'7"	WG: 185	EYES: Brown	HAIR: Black	COMPL. Date	SCARS, MARKS, TATTOOS Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 915 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-4663																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 915 Division Ave NE, #6 Washington, DC 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:22 hours																		
CAUTION AND MEDICAL CONSIDERATIONS (J-302) Select a valid ICD-10 code below for wanted person when using the exclusive indicator.																											
<table border="0"> <tr> <td>01 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>65 = Epilepsy</td> <td>86 = Other (Specify)</td> </tr> <tr> <td>02 = Violent Tendencies</td> <td>26 = Sexually Violent Predator</td> <td>70 = Suicidal</td> <td>87 = Diabetes</td> </tr> <tr> <td>10 = Mental Arts Expert</td> <td>33 = Heart Condition</td> <td>89 = Medication Required</td> <td>88 = Allergies</td> </tr> <tr> <td>15 = Explosive Expertise</td> <td>37 = Alcoholism</td> <td>95 = Homeless</td> <td>29 = Known to abuse drugs</td> </tr> </table>												01 = Armed and Dangerous	25 = Escape Risk	65 = Epilepsy	86 = Other (Specify)	02 = Violent Tendencies	26 = Sexually Violent Predator	70 = Suicidal	87 = Diabetes	10 = Mental Arts Expert	33 = Heart Condition	89 = Medication Required	88 = Allergies	15 = Explosive Expertise	37 = Alcoholism	95 = Homeless	29 = Known to abuse drugs
01 = Armed and Dangerous	25 = Escape Risk	65 = Epilepsy	86 = Other (Specify)																								
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15 = Explosive Expertise	37 = Alcoholism	95 = Homeless	29 = Known to abuse drugs																								
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] slapped 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.

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 I.E. on April 1, 2020, and prepared a Child and Adolescent Protection Center (CAPC) consult report with the following medical findings:

- o I.E. suffered several different injuries, including fractured ribs and a lacerated liver.
- o There is evidence of old and new rib fractures, with the older healing rib fractures occurring at least two weeks prior from I.E.'s presentation to the hospital on April 1, 2020.
- o 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:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: 22nd Dist. (Sex. Offense) Murder (Crucify in Children)

Assistant United States Attorney

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

[Signature]
(JUDGE DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form: CRJ225 (02/01/19)

NOT APPROVED

Revision Date: 11/29/18

Exhibit D p. 023

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-05489	PDID: A06380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HTGT: 5'7"	WGHT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: 1 KA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020	TIME OF OFFENSE: 6:25 hours																	
CAUTION AND MEDICAL EXAMINATIONS INSTRUCTIONS: Select a valid CMC code below for wanted person when using the caution indicator.																									
<table border="0"> <tr> <td><input type="checkbox"/> 00 - Arrest and Detention</td> <td><input type="checkbox"/> 25 - Escape Risk</td> <td><input type="checkbox"/> 45 - Fugitive</td> <td><input type="checkbox"/> 65 - Other Dangerous</td> </tr> <tr> <td><input type="checkbox"/> 20 - Violent Tendencies</td> <td><input type="checkbox"/> 30 - Sexually Violent Tendencies</td> <td><input type="checkbox"/> 50 - Armed</td> <td><input type="checkbox"/> 60 - Deceptive</td> </tr> <tr> <td><input type="checkbox"/> 10 - Mental Instability</td> <td><input type="checkbox"/> 40 - Flight Conviction</td> <td><input type="checkbox"/> 40 - Indication Required</td> <td><input type="checkbox"/> 60 - Alarming</td> </tr> <tr> <td><input type="checkbox"/> 15 - Explosive Expertise</td> <td><input type="checkbox"/> 55 - Alcoholic</td> <td><input type="checkbox"/> 65 - Homeless</td> <td><input type="checkbox"/> 70 - Known to Abuse Drugs</td> </tr> </table>										<input type="checkbox"/> 00 - Arrest and Detention	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 45 - Fugitive	<input type="checkbox"/> 65 - Other Dangerous	<input type="checkbox"/> 20 - Violent Tendencies	<input type="checkbox"/> 30 - Sexually Violent Tendencies	<input type="checkbox"/> 50 - Armed	<input type="checkbox"/> 60 - Deceptive	<input type="checkbox"/> 10 - Mental Instability	<input type="checkbox"/> 40 - Flight Conviction	<input type="checkbox"/> 40 - Indication Required	<input type="checkbox"/> 60 - Alarming	<input type="checkbox"/> 15 - Explosive Expertise	<input type="checkbox"/> 55 - Alcoholic	<input type="checkbox"/> 65 - Homeless	<input type="checkbox"/> 70 - Known to Abuse Drugs
<input type="checkbox"/> 00 - Arrest and Detention	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 45 - Fugitive	<input type="checkbox"/> 65 - Other Dangerous																						
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<input type="checkbox"/> 10 - Mental Instability	<input type="checkbox"/> 40 - Flight Conviction	<input type="checkbox"/> 40 - Indication Required	<input type="checkbox"/> 60 - Alarming																						
<input type="checkbox"/> 15 - Explosive Expertise	<input type="checkbox"/> 55 - Alcoholic	<input type="checkbox"/> 65 - Homeless	<input type="checkbox"/> 70 - Known to Abuse Drugs																						
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.

- o The liver lacerations likely would have occurred within one or two days of I.E.'s presentment 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.
- o 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. Aris opined that the trauma would be equivalent to 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.
- o In Dr. Aris' opinion, an eleven-year-old child weighing approximately 80 pounds would not have been able to cause the extensive injuries seen on either I.E. or even the decedent, G.E., who had similar injuries. Liver and kidneys are internal organs, which takes a tremendous amount of force to physically damage.

AFFIANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charged With: First Degree Murder-Poisoning (Crucially to Children)

Antonio Dale Turner 10/1/20
ASSISTANT UNITED STATES ATTORNEY

NOT AFFIRMED -

Form CDR-171-0050

JAP

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

Joseph H. Pelt
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revised Date: 11-29-05

Exhibit D p. 024

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME Anthony Dale Turner				NICKNAME				ALIAS				CCM 20 051489				PTIC 666183			
SEX	RACE	DOB	HT	WT	EYES	HAIR	COMPL	SCARS, MARKS, TATTOOS											
Male	Black	5/23/1992	5'7"	185	Brown	Black	Dark	Unknown											
DEFENDANT'S HOME ADDRESS 16A 935 Division Ave SE, #5 Washington, DC 20019								DEFENDANT'S PHONE NUMBER (202) 332-1963											
COMPLAINANT'S NAME U.S.								TELEPHONE NUMBER											
LOCATION OF OFFENSE 935 Division Ave SE, #5 Washington, D.C. 20019								DATE OF OFFENSE April 1, 2020				TIME OF OFFENSE 8:25 hours							
CAUTION AND MEDICAL CONDITIONS (CASA) Select a valid CMC code below for wanted person when using the caution indicator.																			
<input type="checkbox"/> 01 = General mental impairment <input type="checkbox"/> 05 = Violent Tendencies <input type="checkbox"/> 10 = Mental Arts Expert <input type="checkbox"/> 15 = Explosive Expertise				<input type="checkbox"/> 20 = Sexually Violent Predator <input type="checkbox"/> 25 = Heart Condition <input type="checkbox"/> 35 = Alcoholism				<input type="checkbox"/> 40 = Epilepsy <input type="checkbox"/> 70 = Suicidal <input type="checkbox"/> 80 = Medication Required <input type="checkbox"/> 85 = Hemophilia				<input type="checkbox"/> 90 = Other (Explain) <input type="checkbox"/> 95 = Dribble <input type="checkbox"/> 100 = Allergies <input type="checkbox"/> 20 = Known to abuse drugs							
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																			

- o 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. Artis, 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.

- o Dr. Artis 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.
- o 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.
- o 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

Charge: *Misc. Viol. Sup. Murder-Related Murder (Crimes to Children)*

ASSISTANT UNITED STATES ATTORNEY

- NCIC APPROVED -

Form CD-171-0100

JAP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd *day* OF *October* 20 *20*

James H. Rife
(JUDGE) (DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-06

Exhibit D p. 025

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN 24-0518R		PHID 60636																	
SEX: Male	RACE: Black	DOB: 5/21/1972	HTG: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS Unknown																			
DEFENDANT'S HOME ADDRESS: FKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1063																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 (CAUTION) Select a valid CMC code below for wanted persons when using the caution indicator.																											
<table border="0"> <tr> <td><input type="checkbox"/> 00 - Armed and Dangerous</td> <td><input type="checkbox"/> 25 - Escape Risk</td> <td><input type="checkbox"/> 45 - Unlucky</td> <td><input type="checkbox"/> 01 - Other (Explain)</td> </tr> <tr> <td><input type="checkbox"/> 05 - Violent Tendencies</td> <td><input type="checkbox"/> 30 - Sexually Violent Predator</td> <td><input type="checkbox"/> 70 - Sensitive</td> <td><input type="checkbox"/> 02 - Inebriated</td> </tr> <tr> <td><input type="checkbox"/> 10 - Mutual Aids Expert</td> <td><input type="checkbox"/> 50 - Host Conditions</td> <td><input type="checkbox"/> 80 - Medication Required</td> <td><input type="checkbox"/> 03 - Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 - Explosive Expertise</td> <td><input type="checkbox"/> 55 - Alcoholic</td> <td><input type="checkbox"/> 85 - Heterophilous</td> <td><input type="checkbox"/> 20 - Known to abuse drugs</td> </tr> </table>												<input type="checkbox"/> 00 - Armed and Dangerous	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 45 - Unlucky	<input type="checkbox"/> 01 - Other (Explain)	<input type="checkbox"/> 05 - Violent Tendencies	<input type="checkbox"/> 30 - Sexually Violent Predator	<input type="checkbox"/> 70 - Sensitive	<input type="checkbox"/> 02 - Inebriated	<input type="checkbox"/> 10 - Mutual Aids Expert	<input type="checkbox"/> 50 - Host Conditions	<input type="checkbox"/> 80 - Medication Required	<input type="checkbox"/> 03 - Allergies	<input type="checkbox"/> 15 - Explosive Expertise	<input type="checkbox"/> 55 - Alcoholic	<input type="checkbox"/> 85 - Heterophilous	<input type="checkbox"/> 20 - Known to abuse drugs
<input type="checkbox"/> 00 - Armed and Dangerous	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 45 - Unlucky	<input type="checkbox"/> 01 - Other (Explain)																								
<input type="checkbox"/> 05 - Violent Tendencies	<input type="checkbox"/> 30 - Sexually Violent Predator	<input type="checkbox"/> 70 - Sensitive	<input type="checkbox"/> 02 - Inebriated																								
<input type="checkbox"/> 10 - Mutual Aids Expert	<input type="checkbox"/> 50 - Host Conditions	<input type="checkbox"/> 80 - Medication Required	<input type="checkbox"/> 03 - Allergies																								
<input type="checkbox"/> 15 - Explosive Expertise	<input type="checkbox"/> 55 - Alcoholic	<input type="checkbox"/> 85 - Heterophilous	<input type="checkbox"/> 20 - Known to abuse drugs																								
GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

ADDITIONAL MPD INVESTIGATION

49. During the course of this investigation, your affiant learned that M.E. attempted to have his foster parent charge 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 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 L.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 Edelen, 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

Charge: *First Degree Murder; Felony Murder (Crash to Children)*

10/17/20
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 2020

Jonathan A. Pelt
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

-NCIC APPROVED-

Form CR117-10/20

Revision Date: 11-29-06

JHP

Exhibit D p. 026

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-957419		PHID: 606380																	
SLX: Male	RACE: Black	DOB: 5/23/1992	HT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: 1KA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 312-1461																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
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 wanted person when using the caution indicator.																											
<table border="0"> <tr> <td>- 00 = Armed and Dangerous</td> <td>- 23 = Lacerate Risk</td> <td>- 65 = Epilepsy</td> <td>- 99 = Other (Explain)</td> </tr> <tr> <td>- 03 = Violent Tendencies</td> <td>- 30 = Sexually Violent Predator</td> <td>- 70 = Societal</td> <td>- 90 = Diabetic</td> </tr> <tr> <td>- 10 = Mental Axis Expert</td> <td>- 50 = Heart Condition</td> <td>- 80 = Medication Required</td> <td>- 95 = Allergies</td> </tr> <tr> <td>- 15 = Explosive Expertise</td> <td>- 85 = Alcoholism</td> <td>- 95 = Hemophilia</td> <td>- 20 = Known to abuse drugs</td> </tr> </table>												- 00 = Armed and Dangerous	- 23 = Lacerate Risk	- 65 = Epilepsy	- 99 = Other (Explain)	- 03 = Violent Tendencies	- 30 = Sexually Violent Predator	- 70 = Societal	- 90 = Diabetic	- 10 = Mental Axis Expert	- 50 = Heart Condition	- 80 = Medication Required	- 95 = Allergies	- 15 = Explosive Expertise	- 85 = Alcoholism	- 95 = Hemophilia	- 20 = Known to abuse drugs
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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 202.491.1608. 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 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.E. attended ECDC.

54. A teacher at ECDC, hereinafter referred to as W-1, 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-1 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 glove 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

Charged with: First Degree Murder, Murder (Crim. 11-101)

Anthony D. Greene 10/1/20
ASSISTANT UNITED STATES ATTORNEY

- NCIC APPROVED -

Form CCR-020-000

JHP

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

Anthony D. Greene
(JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-05

Exhibit D p. 027

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:				ALIASES:				CCN: 20-053489		PDID: 606180															
SEX: Male	RACE: Black	DOB: 5/23/1992	HTG: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																					
DEFENDANT'S HOME ADDRESS: EKA 935 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 332-4663																					
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:																					
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 wanted person when using the caution indicator.																													
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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 30, 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 CISA 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:

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: *First Degree Murder* (Cov(iz. to Children))

10/15/20
ASSISTANT UNITED STATES ATTORNEY

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

Janet A. Peltz
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CR1(17-005)

-- NCIC APPROVED --

JHP

Revision Dates 11-29-16

Exhibit D p. 028

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME		ALIASES		CCN: 20-053489	PDD: 666380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HTG: 5'7	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER																		
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 wasted person when using the caution indicator.																									
<table border="0"> <tr> <td><input type="checkbox"/> 00 - Armed and Dangerous</td> <td><input type="checkbox"/> 25 - Escape Risk</td> <td><input type="checkbox"/> 65 - Intoxicated</td> <td><input type="checkbox"/> 81 - Other (Specify)</td> </tr> <tr> <td><input type="checkbox"/> 05 - Violent Tendencies</td> <td><input type="checkbox"/> 30 - Sexually Violent Predator</td> <td><input type="checkbox"/> 70 - Suicidal</td> <td><input type="checkbox"/> 90 - Dabber</td> </tr> <tr> <td><input type="checkbox"/> 10 - Mental Arts Expert</td> <td><input type="checkbox"/> 35 - Heart Condition</td> <td><input type="checkbox"/> 80 - Medication Required</td> <td><input type="checkbox"/> 60 - Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 - Explosive Expertise</td> <td><input type="checkbox"/> 55 - Alcoholism</td> <td><input type="checkbox"/> 85 - Disruptive</td> <td><input type="checkbox"/> 20 - Known to abuse drugs</td> </tr> </table>										<input type="checkbox"/> 00 - Armed and Dangerous	<input type="checkbox"/> 25 - Escape Risk	<input type="checkbox"/> 65 - Intoxicated	<input type="checkbox"/> 81 - Other (Specify)	<input type="checkbox"/> 05 - Violent Tendencies	<input type="checkbox"/> 30 - Sexually Violent Predator	<input type="checkbox"/> 70 - Suicidal	<input type="checkbox"/> 90 - Dabber	<input type="checkbox"/> 10 - Mental Arts Expert	<input type="checkbox"/> 35 - Heart Condition	<input type="checkbox"/> 80 - Medication Required	<input type="checkbox"/> 60 - Allergies	<input type="checkbox"/> 15 - Explosive Expertise	<input type="checkbox"/> 55 - Alcoholism	<input type="checkbox"/> 85 - Disruptive	<input type="checkbox"/> 20 - Known to abuse drugs
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																									

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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: With First Degree Murder Felony (Covets the Children)

ASSISTANT UNITED STATES ATTORNEY

Print CH 17-158a

NOT APPROVED

[Signature]

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 20 20

[Signature]
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-05

Exhibit D p. 029

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		UCN: 70-053489		PDID: 606180																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																		
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

61. Beginning October 16, 2019, Investigator LaniDa Blake from MPD's YFSD 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 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 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 to 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 ears. 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 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.

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

(Charge: Violent First Degree Murder; Felony Murder; Cruelty to Children)

ASSISTANT UNITED STATES ATTORNEY

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

Jonathan H. Bell
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CM-17b-102a NOT APPROVED *JAP*

Revision Date: 11-29-06

Exhibit D p. 030

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		C.N. 20-033189		PID: 606380																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: 1 KA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																				
COMPLAINANT'S NAME: G.I.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 Hours																		
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

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 lady from mpd came. She said they are closing out the case. She said there is no sign of abuse."
64. On October 18, 2019, CPSCA 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 [M.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 [M.E.] telling them to lay down and your son doing nothing about you right there."

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge With First Degree Murder Felony Murder (Gravely to Children)

10/12/20
ANTONIO DALE TURNER
ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBE) AND SWORN BEFORE ME THIS
 22nd DAY OF October 20
[Signature]
 (JUDGE) DEPUTY CLERK SUPERIOR COURT OF THE
 DISTRICT OF COLUMBIA

Form CR-170-0500

-- NOT APPROVED --

JAP

Revision Date: 11-09-06

Exhibit D p. 031

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 26-053489	PDID: 606380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HTG: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: 1KA 935 Division Ave NE, #6 Washington, DC, 20019							TELEPHONE NUMBER: (202) 332-1653																		
COMPLAINANT'S NAME: G.L.							TELEPHONE NUMBER:																		
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 a wanted person when using the caution indicator.																									
<table border="0"> <tr> <td><input type="checkbox"/> 60 = Armed and Dangerous</td> <td><input type="checkbox"/> 75 = Escape Risk</td> <td><input type="checkbox"/> 61 = Lethal</td> <td><input type="checkbox"/> 81 = Other (Specify)</td> </tr> <tr> <td><input type="checkbox"/> 05 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 70 = Suicide</td> <td><input type="checkbox"/> 90 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Martial Arts Expert</td> <td><input type="checkbox"/> 50 = Heart Condition</td> <td><input type="checkbox"/> 80 = Medication Required</td> <td><input type="checkbox"/> 60 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 55 = Alcoholism</td> <td><input type="checkbox"/> 85 = Heterosexual</td> <td><input type="checkbox"/> 20 = Known to abuse drugs</td> </tr> </table>										<input type="checkbox"/> 60 = Armed and Dangerous	<input type="checkbox"/> 75 = Escape Risk	<input type="checkbox"/> 61 = Lethal	<input type="checkbox"/> 81 = Other (Specify)	<input type="checkbox"/> 05 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 70 = Suicide	<input type="checkbox"/> 90 = Diabetic	<input type="checkbox"/> 10 = Martial Arts Expert	<input type="checkbox"/> 50 = Heart Condition	<input type="checkbox"/> 80 = Medication Required	<input type="checkbox"/> 60 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 55 = Alcoholism	<input type="checkbox"/> 85 = Heterosexual	<input type="checkbox"/> 20 = Known to abuse drugs
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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. videoed himself cleaning up the dining room area. The video shows him with both his brothers (J.F. and G.E.), who are in highchairs. 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 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 states "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.F.] has red marks on his nose and cheek."

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: First Degree Murder, Felony Murder (Crucify to Children)

ASSISTANT UNITED STATES ATTORNEY

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

- NOT APPROVED -

Form CR-171 (2-00)
[Signature]

Revision Date: 12-29-05

Exhibit D p. 032

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CC#: 204053489		PDID: 666180	
SEX: Male	RACE: Black	DOB: 5/23/1992	HEIGHT: 5'7"	WEIGHT: 185	EYES: Brown	HAIR: Black	COMPLEXION: Dark	SCARS, MARKS, TATOOS: Unknown			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:				
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 wanted persons when using the caution indicator.											
40 = Armed and Dangerous			25 = Escape Risk			65 = Intoxicated			81 = Other (Explain)		
45 = Violent Tendencies			30 = Sexually Violent Predator			70 = Susceptible			94 = Diabetic		
50 = Mental Health Issues			55 = Heart Condition			80 = Medication Required			96 = Allergies		
55 = Explosive Exposure			55 = Alcoholic			85 = Heroin/Opium			20 = Known to abuse drugs		
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.] plz get the weight we was working out a lil I had full control over all of the kids in the house sex nothing happened to G.E."

LEASON responded:

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

TURNER responded:

"Ok you right."

69. On December 19, 2019, MPU 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 [L.E.] (his 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:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: 11-1101 (1st Degree Murder-Infancy/Child) (Level 1 to Children)

ASSISTANT UNITED STATES ATTORNEY

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd DAY OF October 2020

Janette H. Rife
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Form CRJ-71-003

NOT APPROVED -

JHP

Revision Date: 11-29-01

Exhibit D p. 033

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:				ALIAS:				CCN: 20-050489		PDID: 606380																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HEIGHT: 5'7"	WEIGHT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																							
DEFENDANT'S HOME ADDRESS: LNA 915 Division Ave NE, #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 332-1663																							
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:																							
LOCATION OF OFFENSE: 925 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 wanted person when using the caution indicator.																															
<table border="0"> <tr> <td><input type="checkbox"/> 01 = Armed and Dangerous</td> <td><input type="checkbox"/> 21 = Escape Risk</td> <td><input type="checkbox"/> 45 = Epilepsy</td> <td><input type="checkbox"/> 61 = Other (explain)</td> </tr> <tr> <td><input type="checkbox"/> 02 = Violent Tendencies</td> <td><input type="checkbox"/> 30 = Sexually Violent Predator</td> <td><input type="checkbox"/> 50 = Suicidal</td> <td><input type="checkbox"/> 70 = Diabetic</td> </tr> <tr> <td><input type="checkbox"/> 10 = Mental Arts Expert</td> <td><input type="checkbox"/> 35 = Heart Condition</td> <td><input type="checkbox"/> 60 = Medication Resistant</td> <td><input type="checkbox"/> 80 = Allergies</td> </tr> <tr> <td><input type="checkbox"/> 15 = Explosive Expertise</td> <td><input type="checkbox"/> 55 = Alcoholism</td> <td><input type="checkbox"/> 85 = Hemophilia</td> <td><input type="checkbox"/> 90 = Known to abuse drugs</td> </tr> </table>																<input type="checkbox"/> 01 = Armed and Dangerous	<input type="checkbox"/> 21 = Escape Risk	<input type="checkbox"/> 45 = Epilepsy	<input type="checkbox"/> 61 = Other (explain)	<input type="checkbox"/> 02 = Violent Tendencies	<input type="checkbox"/> 30 = Sexually Violent Predator	<input type="checkbox"/> 50 = Suicidal	<input type="checkbox"/> 70 = Diabetic	<input type="checkbox"/> 10 = Mental Arts Expert	<input type="checkbox"/> 35 = Heart Condition	<input type="checkbox"/> 60 = Medication Resistant	<input type="checkbox"/> 80 = Allergies	<input type="checkbox"/> 15 = Explosive Expertise	<input type="checkbox"/> 55 = Alcoholism	<input type="checkbox"/> 85 = Hemophilia	<input type="checkbox"/> 90 = Known to abuse drugs
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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 YESD 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 same time, EASON sent TURNER the following text:
"I'm never leaving them with [M.E.] again."

TURNER responded:

"Yeah but it's not his fault he just was 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

AFFIANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charges: First Degree Murder (Child) (Crucial to Children)

Anthony D. Greene 10/17/20
ASSISTANT UNITED STATES ATTORNEY

NOT APPROVED -

Form CD-127-1028

JAP

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

Janette H. Pelt
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-06

Exhibit D p. 034

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-051480	PDJ: 666880																
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
LOCATION OF OFFENSE: 935 Division Ave NE, 46 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 wanted person when using the caution indicator.																									
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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.I.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-1 reported that during early February 2020, IT noticed that the decedent had not been attending the educational facility. W-1 called EASON, inquiring about the status of the decedent. W-1 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.]

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charles W. First Dep. Dir. Bureau of Police, Maryland (Criminal Child Unit)

Anthony D. Greene
ASSISTANT UNITED STATES ATTORNEY 10/17/20

- NCIC APPROVED -

Form CD-17-1-1050

JALP

SUBSCRIBED AND SWORN BEFORE ME THIS

22nd

DAY OF

October

20

Anthony D. Greene
(JUDGE) DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-05

Exhibit D p. 035

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-033409		PDID: 606380																	
SEX: Male	RACE: Black	DOB: 5/23/1992	HTG: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																			
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1663																				
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																				
LOCATION OF OFFENSE: 935 Division Ave NE, #6 Washington, D.C. 20019							DATE OF OFFENSE: April 1, 2020		TIME OF OFFENSE: 8:25 hours																		
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GIVE A BRIEF DESCRIPTION OF WHAT HAPPENED:																											

76. In March 2020, G.E. and J.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, FASCON 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

AFFIANT'S SIGNATURE:

x *Anthony D. Greene*

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: 1st Degree Murder-Felony (Crady in Children)

ASSISTANT UNITED STATES ATTORNEY

Form CD-127-1055

- NOT APPROVED -

JHP

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

Joseph H. Bell
(JUDGE, DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-25-16

Exhibit D p. 036

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEPENDANT'S NAME: Antonio Dale TURNER				NICKNAME:				ALIASES:				CCN: 26-051439				PDD: 806380			
SEX: Male	RACE: Black	DOB: 5/23/1992	HGT: 5'7"	WGT: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown											
DEPENDANT'S HOME ADDRESS: LEA 915 Division Ave NE #6 Washington, DC 20019								TELEPHONE NUMBER: (202) 332-1663											
COMPLAINANT'S NAME: G.E.								TELEPHONE NUMBER:											
LOCATION OF OFFENSE: 925 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 wanted persons when using the caution indicator.																			
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10 = Mental Age Expert				40 = Heart Condition				80 = Medication Required				60 = Ailing							
15 = Explosive Expertise				35 = Alcohol				85 = Hemophilia				20 = Known to abuse drugs							
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 unilate is provided in Appendix B.

SUMMARY

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 I.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

AFFIANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

Charge: *First Degree Murder (Only Murder Credible to Children)*

10/12/20
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

Form CDF17-1030 *JAP* NOT AFFRIMED

Revision Date: 11-09-06

Exhibit D p. 037

Superior Court of the District of Columbia CRIMINAL DIVISION

AFFIDAVIT IN SUPPORT OF AN ARREST WARRANT

USW NO.:

DEFENDANT'S NAME: Antonio Dale TURNER				NICKNAME:		ALIASES:		CCN: 20-053489	PIDID: 606380																
SEX: Male	RACE: Black	DOB: 5/23/1992	HT: 5'7"	WG: 185	EYES: Brown	HAIR: Black	COMPL: Dark	SCARS, MARKS, TATTOOS: Unknown																	
DEFENDANT'S HOME ADDRESS: LKA 935 Division Ave NE, #6 Washington, DC 20019							TELEPHONE NUMBER: (202) 332-1863																		
COMPLAINANT'S NAME: G.E.							TELEPHONE NUMBER:																		
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 wanted person when using the caution indicator.																									
<table border="0"> <tr> <td>00 = Armed and Dangerous</td> <td>25 = Escape Risk</td> <td>45 = Epilepsy</td> <td>81 = Other (Specify)</td> </tr> <tr> <td>05 = Violent Tendencies</td> <td>30 = Sexually Violent Predator</td> <td>70 = Suicidal</td> <td>90 = Deaf/Blind</td> </tr> <tr> <td>10 = Mental Arts Expert</td> <td>50 = Heart Condition</td> <td>80 = Medication Required</td> <td>60 = Allergies</td> </tr> <tr> <td>15 = Explosive Expertise</td> <td>55 = Alcoholic</td> <td>85 = Hemophilia</td> <td>20 = Known to share drugs</td> </tr> </table>										00 = Armed and Dangerous	25 = Escape Risk	45 = Epilepsy	81 = Other (Specify)	05 = Violent Tendencies	30 = Sexually Violent Predator	70 = Suicidal	90 = Deaf/Blind	10 = Mental Arts Expert	50 = Heart Condition	80 = Medication Required	60 = Allergies	15 = Explosive Expertise	55 = Alcoholic	85 = Hemophilia	20 = Known to share drugs
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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 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, PIDID: 606-380) 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.

AFFIANT'S SIGNATURE:

x Anthony D. Greene

TO: WARRANT CLERK

PLEASE ISSUE A WARRANT FOR:

Antonio Dale Turner

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

ASSISTANT UNITED STATES ATTORNEY

Form CTR-171-105a
JAP

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

[Signature]
(JUDGE/DEPUTY CLERK) SUPERIOR COURT OF THE
DISTRICT OF COLUMBIA

Revision Date: 11-29-05

Exhibit D p. 038

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.
	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.
	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.
	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.]
	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.
	There is conflicting detail about a call/calls between EASON and TURNER during the apartment visit: <ol style="list-style-type: none"> 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.

JHP

Anthony D. Greene

Exhibit D p. 039

APPENDIX A

12:40 p.m.	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.
	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.]
	EASON claimed her husband and oldest son, M.E., were at home babysitting G.E. and I.E. She claimed they left the kids at home because of Coronavirus.
1:00 p.m.	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.
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>I'm waiting for you</i>
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 laid 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

Exhibit D p. 040

APPENDIX A

	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 "high fived" TURNER. TURNER said he gave both G.E. and I.E. a tablet and he went to bed.
	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.]
7:00 p.m.	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.] 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.
9:00-9:30 p.m.	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.
10:30 p.m.	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.

22n

Anthony D. Greene

JAP

10/17/20

Exhibit D p. 041

APPENDIX B

Calls on April 1, 2020

<u>April 1, 2020</u>	<u>To/From</u>	<u>Duration</u>
06:08:57am	TURNER to EASON	01:57
06:11:42am	TURNER to EASON	00:10
06:42:28am	TURNER to EASON	15:47
07:16:25am	TURNER to EASON	00:22
07:51:49am	TURNER to EASON	Not answered
07:52:01am	EASON to TURNER	00:16
08:23:08am	EASON to TURNER	Not answered
08:23:18am	EASON to TURNER	Not answered
08:23:37am	TURNER to EASON	00:03
08:23:43am	TURNER to EASON	00:04
08:23:50am	TURNER to EASON	00:03
08:24:04am	TURNER to EASON	00:03
08:24:11am	TURNER to EASON	00:03

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

