

Presented to the Court by the foreman of the Grand Jury in open Court, in the presence of the Grand Jury and FILED in the U.S. DISTRICT COURT at Seattle, Washington.

February 28 20 18
WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff,
v.
MATTHEW TYLER CHARLES,
Defendant.

NO. CR17-5531RBL
SUPERSEDING INDICTMENT

The Grand Jury charges that:

COUNT 1

(Domestic Assault by a Habitual Offender)

On or about October 21, 2017, at Port Angeles, on tribal trust lands on the Lower Elwha Klallam Indian Reservation, Indian Country as defined by Title 18, United States Code, Section 1151, and within the Western District of Washington, MATTHEW TYLER CHARLES, having been convicted of at least two assaults against an intimate partner, to wit:

- Assault in the Fourth Degree - Domestic Violence, in violation of the State of Washington RCW 9A.36.041, in the Clallam County District Court, on or about January 27, 2015, Case No 4Z1094215;
- Assault in the Second Degree – Domestic Violence, in violation of Elwha Justice Codes 9.5.2(1)b and 9.26.1(1), in the Lower Elwha Klallam Tribal Court, on or about December 15, 2010, Case No. 2010-CR-0101;

- 1 • Assault in the Second Degree - Domestic Violence, in violation of the
- 2 State of Washington RCW 9A.36.021(1)(a), in the Clallam County
- 3 Superior Court, on or about October 6, 2006, Case No. 06-1-00410-7;
- 4 • Assault in the Forth Degree – Domestic Violence, in violation of Elwha
- 5 Justice Codes 9.5.4(1) and 9.26.(1), in the Lower Elwha Klallam Tribal
- 6 Court, on or about August 31, 2005, Case No. 05-08-0488;

7 assaulted Jane Doe, a person with whom he shares a child in common and who is similarly
 8 situated to a spouse.

9 All in violation of Title 18, United States Code, Sections 117(a).

11 A TRUE BILL:

12 DATED: 28 Feb. 2018

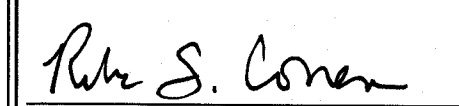
13 *Signature of the foreperson is redacted pursuant*
 14 *to the policy of the Judicial Conference of the*
 15 *United States*

16 _____
 17 FOREPERSON

18 
 19 ANNETTE L. HAYES
 20 United States Attorney

21 
 22 TODD GREENBERG
 23 Assistant United States Attorney

24 
 25 J. TATE LONDON
 26 Assistant United States Attorney

27 
 28 REBECCA S. COHEN
 Assistant United States Attorney