EDWARD MANIBUSAN, ATTORNEY GENERAL J. ROBERT GLASS, JR., (F0523) Chief Solicitor OFFICE OF THE ATTORNEY GENERAL Commonwealth of the Northern Mariana Islands Saipan, MP 96950-8907 Hon. Juan A. Sablan Memorial Building. 2nd Floor Telephone: (670) 237-7500

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IN THE SUPERIOR COURT FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS,) CRIMINAL CASE NO. 22- AGID Case No. 21-020
Plaintiff,))
vs. RALPH ANTHONY DELEON GUERRERO TORRES, DOB: 08/06/1979,	INFORMATION
Defendant.	

COUNT I: MISCONDUCT IN PUBLIC OFFICE

On or about April 12, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for himself using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT II: MISCONDUCT IN PUBLIC OFFICE

On or about April 12, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for Diann T. Torres using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT III: MISCONDUCT IN PUBLIC OFFICE

On or about June 8, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for himself using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT IV: MISCONDUCT IN PUBLIC OFFICE

On or about July 11, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, Ralph Anthony Deleon Guerrero Torres, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for himself using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT V: MISCONDUCT IN PUBLIC OFFICE

On or about July 11, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, Ralph Anthony Deleon Guerrero Torres, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for Diann T. Torres using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT VI: MISCONDUCT IN PUBLIC OFFICE

On or about August 13, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, Ralph Anthony Deleon Guerrero Torres, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for himself using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT VII: MISCONDUCT IN PUBLIC OFFICE

On or about August 16, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for Diann T. Torres using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT VIII: MISCONDUCT IN PUBLIC OFFICE

On or about September 25, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for himself using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT IX: MISCONDUCT IN PUBLIC OFFICE

On or about November 15, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for himself using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT X: MISCONDUCT IN PUBLIC OFFICE

On or about November 27, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for himself using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT XI: MISCONDUCT IN PUBLIC OFFICE

On or about November 27, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for Diann T. Torres using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT XII: MISCONDUCT IN PUBLIC OFFICE

On or about December 17, 2018, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, while being Governor of the Commonwealth of the Northern Mariana Islands, and an employee of the Commonwealth government, did an illegal act under color of office, to wit: he violated 1 CMC § 7407(f) in that he caused to be issued airline tickets for business class, first class, or other premium class travel for himself using Commonwealth funds, in violation of and made punishable by 6 CMC § 3202.

COUNT XIII: THEFT

On or between April 12, 2018 to May 30, 2019, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, unlawfully took, used, or consumed the property of another with intent to permanently deprive the owner of their rights to the property, with an aggregate amount of \$20,000.00 or more, to wit: Ralph Anthony Deleon Guerrero Torres did unlawfully take Commonwealth property by using Commonwealth funds to pay for first, business, or premium class travel for himself, and for airline tickets for Diann T. Torres, on multiple occasions from April 12, 2018 to May 30, 2019, in violation of 6 CMC § 1601(a) and made punishable by 6 CMC § 1601(b) and (c).

COUNT XIV: CONTEMPT

On or about December 10, 2021, on Saipan, Commonwealth of the Northern Mariana Islands, the Defendant, **Ralph Anthony Deleon Guerrero Torres**, failed to appear in compliance with a subpoena, in violation of 1 CMC § 1306(a)(1) and made punishable by 1 CMC § 1307(a).

DATED April 8, 2022.

OFFICE OF THE ATTORNEY GENERAL EDWARD MANIBUSAN, Attorney General

By: I Robert Glass Ir 10523

J. Robert Glass, Jr., F0523 Chief Solicitor/ Assistant Altorney General