



**Count I (Charge No. 001)**

Sexual Assault in the First Degree; AS 11.41.410(a) (1)

On August 9, 2000, at or near Anchorage, in the Third Judicial District, State of Alaska, JOHN DOE, an unknown male with Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11), CSF1PO (10, 13), Amelogenin (X,Y), Penta E (11,15) and Penta D (9,12) with the estimated frequency (13 core loci) of the above genetic profile being approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat population) and 1 in 14 quintillion (Yupik population), knowingly engaged in sexual penetration with A.A. with reckless disregard of her lack of consent.

All of which is an unclassified felony offense being contrary to and in violation of AS 11.41.410(a) (1) and against the peace and dignity of the State of Alaska.

**Count II (Charge No. 002)**

Kidnapping; AS 11.41.300(a) (1) (C)

On August 9, 2000, at or near Anchorage, in the Third Judicial District, State of Alaska, JOHN DOE, an unknown male with Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11),

CSF1PO (10, 13), Amelogenin (X,Y), Penta E (11,15) and Penta D (9,12) with the estimated frequency (13 core loci) of the above genetic profile being approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat population) and 1 in 14 quintillion (Yupik population), restrained A.A. with intent to: (1) inflict physical injury upon or sexually assault A.A.; or (2) place A.A. in apprehension of being subjected to serious physical injury or sexual assault.

All of which is an unclassified felony offense being contrary to and in violation of AS 11.41.300(a) (1) (C) and against the peace and dignity of the State of Alaska.

**Count III (Charge No. 003)**

Assault in the First Degree; AS 11.41.200(a)(1)

On August 9, 2000, at or near Anchorage, in the Third Judicial District, State of Alaska, JOHN DOE, an unknown male with Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11), CSF1PO (10, 13), Amelogenin (X,Y), Penta E (11,15) and Penta D (9,12) with the estimated frequency (13 core loci) of the above genetic profile being approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat

population) and 1 in 14 quintillion (Yupik population), recklessly caused serious physical injury to A.A. by means of a dangerous instrument, hands and/or gag.

All of which is a class A felony offense being contrary to and in violation of AS 11.41.200(a)(1) and against the peace and dignity of the State of Alaska.

**Count IV (Charge No. 003)**

Assault in the Second Degree; AS 11.41.210 (a)(1) and/or (a)(2)

On August 9, 2000, at or near Anchorage, in the Third Judicial District, State of Alaska, JOHN DOE, an unknown male with Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11), CSF1PO (10, 13), Amelogenin (X,Y), Penta E (11,15) and Penta D (9,12) with the estimated frequency (13 core loci) of the above genetic profile being approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat population) and 1 in 14 quintillion (Yupik population), with intent to cause physical injury to A.A. caused physical injury to her by means of a dangerous instrument; or recklessly caused serious physical injury to A.A.

All of which is a class A felony offense being contrary to and in violation of AS 11.41.210(a)(1) and/or (a)(2) and against the peace and dignity of the State of Alaska.

**Count V (Charge No. 005)**

Assault in the Third Degree; AS 11.41.220 (a)(1)(A)

On August 9, 2000, at or near Anchorage, in the Third Judicial District, State of Alaska, JOHN DOE, an unknown male with Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11), CSF1PO (10, 13), Amelogenin (X,Y), Penta E (11,15) and Penta D (9,12) with the estimated frequency (13 core loci) of the above genetic profile being approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat population) and 1 in 14 quintillion (Yupik population), recklessly placed A.A. in fear of imminent serious physical injury by means of a dangerous instrument, a knife.

All of which is a class A felony offense being contrary to and in violation of AS 11.41.220(a)(1)(A) and against the peace and dignity of the State of Alaska.

**Count VI (Charge No. 006)**

Assault in the Third Degree; AS 11.41.220 (a)(1)(A)

On August 9, 2000, at or near Anchorage, in the Third Judicial District, State of Alaska, JOHN DOE, an unknown male with Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11),

CSF1PO (10, 13), Amelogenin (X,Y), Penta E (11,15) and Penta D (9,12) with the estimated frequency (13 core loci) of the above genetic profile being approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat population) and 1 in 14 quintillion (Yupik population), recklessly placed A.A. in fear of imminent serious physical injury by means of a dangerous instrument, a gag.

All of which is a class A felony offense being contrary to and in violation of AS 11.41.220(a)(1)(A) and against the peace and dignity of the State of Alaska.

I, Jean L. Dupuis, state under oath that this complaint is based upon my personal investigative efforts as well the efforts of other law enforcements and analysts at the Alaska Scientific Crime Detection Laboratory and sets forth true and accurate information to the best of my ability and belief.

1. I am a Police Officer employed by the Anchorage Police Department (APD). I have been a Police Officer for 12 ½ years. I am presently assigned to the Detective Division, Sexual Assault Unit (SVU). During my tenure as a police officer, I have investigated such cases as sexual assaults, assaults, burglaries, child abuse, death, drug and alcohol, fraud, robbery, scheme to defraud, and theft. These assignments include complaints as well as investigations of felony and misdemeanor crimes. I am currently the assigned principle investigating detective on this sexual assault cold case, APD case number 00-40733.

2. I am asking the court to issue in this case an arrest warrant for JOHN DOE, an unknown male with Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain

Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11), CSF1PO (10, 13), Amelogenin (X,Y), Penta E (11,15) and Penta D (9,12) with the estimated frequency (13 core loci) of the above genetic profile being approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat population) and 1 in 14 quintillion (Yupik population).

3. I am familiar with the facts and circumstances surrounding this investigation as a result of my own investigative efforts, my review of witness statements, the investigative efforts of other law enforcement officers, and the efforts of analysts at the Alaska Scientific Crime Detection Laboratory - all of which I believe to be reliable and truthful.

4. On August 9, 2000, at about 0042 hrs, Anchorage Police K9 Officer L. Brown observed a native female who was walking along the road way near the intersection of Mt View Drive and Pine Street. She appeared to wearing only have a long night shirt.

5. When Officer L. Brown contacted the female, later identified as A.A., he observed that she had obviously been physically assaulted. A.A. had blood on her face and was bleeding from serious abrasions on her left leg and side.

6. A.A. initially told Officer L. Brown that she just wanted to go home and get cleaned up, but after a couple of minutes advised that that she had been tied

up, gagged, and sexually assaulted by a white male driving a blue and gray or white SUV.

7. Officer L. Brown had noted a two toned blue and gray Chevy S-10 Blazer in the area of the Mt. View Williams (now Holiday) gas station just prior to seeing and making contact with A.A. It drew his attention because the driver appeared to be in a hurry. Officer Brown also noticed the vehicle was occupied only by a driver. While the driver seemed to be in a hurry, Officer L. Brown did observe a traffic violation, so he did not initiate a traffic stop.

8. A.A. described the suspect to Officer L. Brown as a white male about 30 to 40 years old, long hair in a pony tail, mustache, approximately 5'10", and of medium build.

9. A.A. indicated that the suspect had picked her up in the SUV purportedly to give her a ride. The suspect pulled a knife, tied her up, and sexually assaulted her. A.A.'s description of the SUV was similar to the SUV Officer L. Brown had just observed in the Williams parking lot. Police put out a locate for the suspect vehicle, but it was not found in the area.

10. A.A. advised that the suspect drove east bound on Mt. View Drive after sexually assaulting her and that she remained tied up. She believed the suspect was going to continue toward Boniface Blvd. and possibly out onto the highway. A.A. became convinced that that the suspect he was going to hurt her further so she decided to jump from the moving vehicle.

11. A.A. reported that she jumped out of the SUV said as they got to McCarrey Street. She indicated that she sustained the injuries to her left side as a result.

12. APD officers recovered rope and a jacket in the area of McCarrey and Mt. View Drive that A.A. indicated came from the SUV. APD officers took photographs of the physical evidence at the scene and placed the recovered items into evidence.

13. An officer took A.A. to a hospital where she received treatment and was interviewed by now retired APD Det. Howard Shore.

14. Detective Shore attempted to interview A.A. but because of the pain medication she was given for the injuries she sustained, the initial interview was suspended until a later date. A SART exam was completed and evidence from A.A. collected.

15. During the initial interview with Det. Shore, A.A. reported that she had been on the road just behind the Williams gas station on Mt. View Drive when a white male in the blue two tone SUV truck pulled up and asked if she needed a ride.

16. A.A. accepted the ride and when she got into the vehicle, told the suspect that she was heading to Fairview to visit a friend. The suspect drove A.A. to an industrial section in the Ship Creek area and then parked the SUV.

17. A.A. advised that the suspect asked her for sex and when she refused, he pulled out a knife and grabbed a rope that was in the vehicle. The suspect tied her up with the rope and then threatened her with the knife, telling her that if she did not do what he wanted he would injure her.

18. A.A. said the suspect then hit her on the head and started to strangle her. The suspect demanded anal sex but A.A. refused, so the suspect forced her

to perform fellatio on him. As she complied, the suspect inserted his fingers into her vagina.

19. Det. Shore had to suspend the interview because A.A. kept falling asleep from the pain medications she was provided. Det. Shore resumed the interview the next day, August 10<sup>th</sup>, 2000.

20. A.A. clarified what the suspect had done. She told Det. Shore that the suspect picked her up and drove to the Ship Creek area. She asked him why he was going there and he told her he wanted to talk to her. When he parked, he moved closer to her and tried to take off her clothing. She asked him what he was doing and he told her to shut up and hit her on the head.

21. The suspect then started getting more physical with her, showing her the knife, and then forcing her to lie back as he got on top of her. A.A. indicated that he forced penile / vaginal intercourse with her, but she does not think he ejaculated. She thinks a truck driving by scared him and caused him to stop.

22. She continued telling Det. Shore that the suspect was holding her down as the truck came by and he told her she better not try to run or he would cut her throat. He grabbed a gag and rope and tied her up. She indicated that when he was gagging her, he was also strangling her and she said she started seeing stars and became dizzy.

23. A.A. begged for him to stop for a minute so she could breathe and the suspect did for a moment and then asked her if she wanted to live or die.

24. A.A. told the suspect that she wanted to live so he told her to do what he said. A.A. then let him gag and tie her up. He then told her to lie down. When she did, the suspect covered her with a jacket that was inside the SUV. The suspect told A.A. that they were going to go somewhere else and it would take about 10 to 15 minutes to get there.

25. A.A. said he started to drive away. The suspect continued to threaten her, telling her that he did not care what happened to him and that he would kill or stab her if she tried to get away.

26. A.A. was afraid that he was going to kill her anyway and leave her in the woods somewhere.

27. As they were driving east bound on Mt. View Drive, she decided that she would rather get hurt from jumping out of the moving vehicle than being stabbed by the suspect, so she jumped out of the SUV as they got to Lions Park by McCarrey Street.

28. A.A. verified to Det. Shore the description of the suspect and the suspect vehicle she had given Officer L. Brown the night of the incident.

29. On August 10, 2000 at about 0157 hrs, Officer P.E. Martin and Officer Stafford observed a two tone blue and gray S-10 Blazer that matched the described suspect vehicle. They noted the license plate to be CCP793.

30. They conducted a traffic stop on the vehicle and identified two individuals inside, a female named Ramona Gola (DOB 4/16/1973) and a male named Isiah Krukoff (DOB 3/31/1964). Krukoff matched the general description of the suspect given by A.A.

31. The vehicle belonged to Ms. Gola who consented to a search by the officers. The search of the vehicle did not reveal any of the clothing or shoe left behind by A.A. The officers did see a knife inside the vehicle and seized it with the consent of Ms. Gola and Mr. Krukoff. Mr. Krukoff also consensually provided the officers a known DNA sample.

32. All of the DNA evidence seized in connection with the investigation was submitted to the Alaska Scientific Crime Detection Laboratory. Laboratory personnel produced a screening report on October 20, 2000.

33. The screening report indicated several stains from the night shirt A.A. was wearing at the time Officer L. Brown initially contacted her and the rope used to restrain A.A. which was recovered by police near the area A.A. had jumped from the SUV tested positive to a presumptive test for blood.

34. The screening report also indicated that no spermatozoa were found on any of the swabs, smears, or samples taken from A.A.'s body and underwear. The report, however, did indicate that a stain containing spermatozoa was on the outside left leg of a pair of shorts A.A. was wearing that night of August 9, 2000.

35. Laboratory personnel isolated the spermatozoa stain from the shorts under item # 703318-JFA. They also isolated the two stains that tested positive for a presumptive test for blood from the rope under item # 619314-JFA. The final stain isolated by laboratory personnel under item # 619313-JFA was the stain from the night shirt. Laboratory personnel also isolated several hair samples from animals and humans.

36. The screening report indicated that a subsequent report would follow with DNA results.

37. On December 24, 2002 a report was generated by Fairfax Identity Laboratories (FIL) of Fairfax, Virginia for a sample they were provided by the Alaska Scientific Crime Detection Laboratory. According to the report, FIL received one item number from this case, isolated stain 619314-JFA - the stains from the rope.

38. FIL determined a DNA profile from the item by using the polymerase chain reaction (PCR) test for short tandem repeats (STR) procedure. FIL tested 14 loci, which were D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12, 12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11), CSF1PO (10, 13) and Amelogenin (AMEL) (X,Y). The FIL report does not set forth any frequency statistics.

39. After developing the DNA genetic profile, FIL sent it to the Alaska Scientific Crime Detection Laboratory for entry into the CODIS system. The profile was entered into the CODIS database in 2003.

40. In May, 2010, during a review of cold cases that were coming close to the statute of limitations, an employee of the Alaska Scientific Crime Detection Laboratory, Toni Otten, notified the Anchorage District Attorney Office and the Anchorage Police Department Special Victims Unit that the statute of limitation in this case would expire on August 9, 2010 unless charged prior to that date.

41. It was agreed by APD and the DA's office that the case should again be reviewed and could be reviewed as a result of funding through a Federal Cold Case Grant. The case was assigned to me on July 1, 2010.

42. After gathering the police and laboratory reports, I reviewed them case for possible follow-up. I quickly discovered that the consensual known sample

provided by Isiah Krukoff never was processed for a DNA profile and compared to the possible suspect DNA profile developed by FIL.

43. I also determined that that the spermatozoa stain isolated under item # 703318-JFA and recovered from A.A.'s shorts had never been processed for a DNA profile or compared to the known sample from Krukoff or the DNA profile developed by FIL from the rope.

44. I immediately contacted the Alaska Scientific Crime Detection Laboratory and submitted a RUSH request to have these DNA work completed.

45. In speaking to the lab personnel, I was asked to try to track down the A.A.'s boyfriend during 2000 and obtain from him a DNA sample. Because A.A. mentioned to the officers that the clothing she was wearing belonged to her boyfriend, the laboratory analysts wanted to see if they could eliminate him as a possible donor of the semen sample.

46. On July 22, 2010, I received a call from Michelle Collins, the supervisor of the DNA section of the Alaska Scientific Crime Detection Laboratory who orally advised that the DNA profile developed from the known sample of Isiah Krukoff had been compared to the DNA profile recovered from the rope and that the profile from the rope was not that of Mr. Krukoff. Ms. Collins advised that the spermatozoa stain from A.A.'s shorts was still being analyzed and the laboratory hoped to have a result to me by the end of the following week.

47. On July 26, 2010, I was able to find and retrieve a known sample from A.A.'s former boyfriend and submitted it to the laboratory as a potential elimination sample.

48. On August 4, 2010 I received a phone call from Alaska Scientific Crime Detection Laboratory DNA Forensic Scientist / Analyst Sara Graziano who informed me that she was preparing her report on this case and because of the short time she was verbally advising me the DNA profiles from the shorts stain and rope stain are consistent.

49. Analyst Graziano's report, dated August 4, 2010, reflects that the genetic profile from the stain on the rope (Item # 619314-JFA) and the genetic profile from the spermatozoa stain from the shorts A.A. was wearing the night of August 9, 2000 (Item # 703318-JFA) are consistent with one another. The report also excludes Isiah Krukoff and A.A.'s boyfriend in 2000 as possible sources of the stains.

50. The Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11), CSF1PO (10, 13), and Amelogenin (X,Y) are present in both the stains from the rope and shorts.

51. The reported genetic profile regarding the stain on the rope developed by FIL and the genetic profile regarding the spermatozoa stain on the shorts developed by the Alaska Scientific Crime Detection Laboratory differ in that the Alaska lab tested two loci (Penta E and Penta D) in addition to the 13 loci tested by both laboratories. Additionally, Analyst Graziano has advised that the FIL and Alaska laboratory findings at loci D5S818 are the same but reported differently, "12" versus "12, 12".

52. I also have reviewed a report from the Alaska Scientific Crime Detection Laboratory, dated August 5, 2010, reflecting that the estimated frequency (13 core loci) of the above genetic profile is approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat population) and 1 in 14 quintillion (Yupik population).

53. It is my understanding that the DNA profile as to which I am seeking an arrest warrant will be searched for a matching profile against the CODIS registry system on a regular basis and that I, or another detective in the APD Sexual Assault Unit, will promptly be notified upon a match being identified.

54. In light of the above, I respectfully ask the court to issue an arrest warrant for JOHN DOE, an unknown male with Short Tandem Repeat (STR) Deoxyribonucleic Acid (DNA) Profile at the following genetic locations, using the Identifier Polymerase Chain Reaction (PCR) Amplification kit: D3S1358 (15, 17), vWA (17, 18), FGA (21, 22), D8S1179 (13, 15), D21S11 (31, 33.2), D18S51 (17, 18), D5S818 (12), D13S317 (8, 10), D7S820 (10, 11), D16S539 (9, 13), THO1 (8, 9.3), TPOX (8, 11), CSF1PO (10, 13), Amelogenin (X,Y), Penta E (11,15) and Penta D (9,12) with the estimated frequency (13 core loci) of the above genetic profile being approximately 1 in 34 quadrillion (Caucasian population), 1 in 142 quadrillion (African-American population), 1 in 16 quintillion (Athabaskan population), 1 in 129 quintillion (Iupiat population) and 1 in 14 quintillion (Yupik population).

**I swear under oath that the information set forth above is true and accurate to the best of my ability and belief.**

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Detective Jean L. Dupuis, Jr.  
Anchorage Police Department

SUBSCRIBED AND SWORN before me this \_\_\_\_\_ day of August, 2010.

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MAGISTRATE / DISTRICT COURT JUDGE / SUPERIOR COURT JUDGE