

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**Holding a Criminal Term
Grand Jury Sworn in on May 18, 2022**

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| UNITED STATES OF AMERICA | : | CRIMINAL NO. 22-cr-96 (CKK) |
| | : | |
| v. | : | VIOLATIONS: |
| | : | |
| LAUREN HANDY, | : | COUNT 1: 18 U.S.C. § 241 |
| | : | (Conspiracy Against Rights) |
| JONATHAN DARNEL, | : | |
| | : | COUNT 2: 18 U.S.C. §§ 248(a)(1), 2 |
| JAY SMITH (aka JUANITO PICHARDO), | : | (Clinic Access Obstruction) |
| | : | |
| PAULA “PAULETTE” HARLOW, | : | |
| | : | |
| JEAN MARSHALL, | : | |
| | : | |
| JOHN HINSHAW, | : | |
| | : | |
| HEATHER IDONI, | : | |
| | : | |
| WILLIAM GOODMAN, | : | |
| | : | |
| JOAN BELL, and | : | |
| | : | |
| HERB GERAGHTY | : | |
| | : | |
| Defendants. | : | |

SUPERSEDING INDICTMENT

The Grand Jury for the District of Columbia charges that at times material to this superseding indictment, on or about the dates and at the approximate times stated below:

Introduction

1. The Clinic was a provider of women’s reproductive health services, including abortions, in the District of Columbia. The Clinic provided services on an appointment-only basis.

2. The following individuals conspired with one another and with others known and unknown to obstruct access to the Clinic on October 22, 2020:

- a. LAUREN HANDY, an individual from Virginia;
- b. JONATHAN DARNEL, an individual from Virginia
- c. JAY SMITH (also known as JUANITO PICHARDO), an individual from New York;
- d. PAULETTE HARLOW, an individual from Massachusetts;
- e. JEAN MARSHALL, an individual from Massachusetts;
- f. JOHN HINSHAW, an individual from New York;
- g. HEATHER IDONI, an individual from Michigan;
- h. WILLIAM GOODMAN, an individual whose last known address was in Wisconsin;
- i. JOAN BELL, an individual from New Jersey; and
- j. HERB GERAGHTY, an individual with a last known address in Pennsylvania.

3. Nurse K was a nurse employed by the Clinic and was at work on the morning of October 22, 2020.

4. Medical Specialist H was a medical specialist employed by the Clinic and was at work on the morning of October 22, 2020.

5. Clinic Administrator B was the Clinic administrator and was at work on the morning of October 22, 2020.

6. Patient A was a Clinic patient who was seeking to obtain reproductive health services at the Clinic on October 22, 2020.

COUNT ONE
18 U.S.C. § 241
(Conspiracy Against Rights)

7. The allegations contained in Paragraphs 1 through 6 of this indictment are realleged and incorporated herein by reference.

8. From October 7, 2020, to October 22, 2020, in the District of Columbia and elsewhere, the defendants,

**LAUREN HANDY,
JONATHAN DARNEL,
JAY SMITH,
PAULETTE HARLOW,
JEAN MARSHALL,
JOHN HINSHAW,
HEATHER IDONI,
WILLIAM GOODMAN,
JOAN BELL, and
HERB GERAGHTY**

did willfully combine, conspire, and agree with one another, and with other persons known and unknown, to injure, oppress, threaten, and intimidate patients and employees of the Clinic in the District of Columbia in the free exercise and enjoyment of the rights and privileges secured to them by the laws of the United States—namely, the right to obtain and seek to obtain, and to provide and seek to provide, reproductive health services, as provided by 18 U.S.C. § 248(c)(1).

Purpose of the Conspiracy

9. It was the purpose of the conspiracy to create a blockade to stop the Clinic from providing, and patients from obtaining, reproductive health services.

Manner and Means

10. The conspiracy was carried out through the following manner and means, among others:

- a. The conspirators communicated with one another in advance;
- b. The conspirators traveled to the District of Columbia from other states;

- c. The conspirators used deception to gather information about and gain access to the Clinic;
- d. The conspirators used force to enter the Clinic and to obstruct access to and the functioning of the Clinic; and,
- e. The conspirators brought tools to barricade themselves inside the Clinic, including ropes and chains.

Overt Acts

11. In furtherance of the conspiracy, and to accomplish the objects of the conspiracy, the conspirators committed various overt acts, including, but not limited to, the following:

12. HANDY used her mobile phone to call and text several co-conspirators between October 7, 2020, and October 22, 2020, to organize and plan a blockade at the Clinic.

13. DARNEL used his mobile phone to call and text several co-conspirators between October 15, 2020, and October 22, 2020.

14. On October 13, 2020, HANDY procured a monetary donation to pay for a lodging reservation in the District of Columbia that HANDY made for herself and GERAGHTY.

15. HANDY made that lodging reservation through Airbnb, Inc., at 133 Quincy Place NE, Washington, D.C., for October 21-22, 2020.

16. HANDY also made other lodging arrangements elsewhere in the District of Columbia for several co-conspirators from Michigan, New York, and Massachusetts.

17. Days before October 22, 2020, HANDY called the Clinic, falsely represented that she was a female named "Hazel Jenkins" who needed reproductive health services, and made an appointment for 9:00 a.m. on the morning of October 22, 2020.

18. SMITH, HARLOW, MARSHALL, HINSHAW, IDONI, GOODMAN, BELL, and GERAGHTY traveled to the District of Columbia from other states.

19. On October 22, 2020, before the Clinic was open for services, HANDY approached Medical Specialist H in the hallway outside the Clinic and falsely represented herself as “Hazel Jenkins” and stated that she had a medical appointment.

20. At 8:56 a.m. on October 22, 2020—shortly after HANDY was claiming to be a Clinic patient—DARNEL, who was outside of the building in which the Clinic was located, used his Facebook account to create an event that he titled, “No one dies today.” DARNEL captioned it, “Starting soon! Tune in!”

21. As DARNEL announced an imminent Facebook event, HANDY, SMITH, HARLOW, MARSHALL, HINSHAW, IDONI, GOODMAN, BELL, and GERAGHTY gathered in the hallway and stairwell outside of the Clinic’s front door.

22. When the Clinic opened for services on October 22, 2020, and Medical Specialist H unlocked the Clinic’s door to admit patients with scheduled appointments, HANDY, SMITH, HARLOW, MARSHALL, HINSHAW, IDONI, GOODMAN, BELL, and GERAGHTY forcefully pushed through the Clinic door into the Clinic’s waiting room.

23. When SMITH forcefully backed into the clinic, he caused Nurse K to stumble and sprain her ankle.

24. Once inside the Clinic’s waiting room, HANDY, SMITH, HARLOW, MARSHALL, HINSHAW, IDONI, GOODMAN, BELL, and GERAGHTY set about blockading two Clinic doors.

25. HANDY directed conspirators on what to do.

26. HINSHAW and MARSHALL moved chairs in the Clinic's waiting room to block a door to the Clinic's treatment area.

27. HARLOW brought with her a duffle bag that contained a chain and rope.

28. SMITH, HARLOW, MARSHALL, HINSHAW, and BELL sat in the chairs they had placed to obstruct passage into the Clinic's treatment area and chained and roped themselves together.

29. GOODMAN and IDONI went into the hallway outside of the Clinic and stood in front the doorway of the employee entrance to the Clinic.

30. When Patient A arrived at the Clinic lobby for a scheduled reproductive health service, MARSHALL and other conspirators blocked her from entering the Clinic's treatment area.

31. When Patient A attempted to use the employee entrance in the hall to gain access to the Clinic's treatment area, GOODMAN and IDONI blocked Patient A from entering the Clinic.

32. HANDY stood at the doorway of the Clinic's main entrance, and blocked individuals trying to enter the waiting room.

33. GERAGHTY, at times, stood with HANDY at the doorway of the Clinic's main entrance blocking access.

34. GERAGHTY, at times, stood with GOODMAN and IDONI in front of the Clinic's employee entrance blocking access.

35. At the same time that the conspirators began blockading the Clinic, DARNEL, who was standing outside of the Clinic's building, used Facebook to live-stream a video of the conspirators' activities. He started the live-stream by saying, in part, that at that moment, "we have people intervening physically with their bodies to prevent women from entering the clinic to murder their children."

36. While streaming live on Facebook, DARNEL entered the building and went to the Clinic's entrance. As he broadcast the conspirators blockading the entrances to the Clinic, DARNEL stated, in part, "[T]he rescuers are doing their job. They're not allowing women to enter the abortion clinic. As long as they're in there, no women can go in to kill their children."

(In Violation of Title 18, United States Code, Section 241)

COUNT TWO
18 U.S.C. §§ 248(a)(1), 2
(Freedom of Access to Clinic Entrances Act)

37. The allegations contained in Paragraphs 1 through 6 and 11 through 36 of this indictment are realleged and incorporated herein by reference.

38. On October 22, 2020, in the District of Columbia and elsewhere, the defendants,

**LAUREN HANDY,
JONATHAN DARNEL,
JAY SMITH,
PAULETTE HARLOW,
JEAN MARSHALL,
JOHN HINSHAW,
HEATHER IDONI,
WILLIAM GOODMAN,
JOAN BELL, and
HERB GERAGHTY**

aiding and abetting one another, did by force and physical obstruction, intentionally injure, intimidate, and interfere with, and attempt to injure, intimidate, and interfere with, Patient A and the employees of the Clinic, because Patient A was obtaining, and the Clinic was providing, reproductive health services.

(In Violation of Title 18, United States Code, Sections 248(a)(1) and 2)

A TRUE BILL:

FOREPERSON

A handwritten signature in blue ink that reads "Matthew M. Graves" followed by a stylized flourish.

MATTHEW M. GRAVES
ATTORNEY FOR THE UNITED STATES
IN AND FOR THE DISTRICT OF COLUMBIA

KRISTEN M. CLARKE
ASSISTANT ATTORNEY GENERAL
CIVIL RIGHTS DIVISION