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Case No: 23-002912

**STATE OF LOUISIANA
19TH JDC
EAST BATON ROUGE SHERIFF OFFICE
FILE #23-002912**

AFFIDAVIT FOR ARREST WARRANT

**STATE OF LOUISIANA
VS.**

**Lieutenant Tarik Mokdaf IBM# S2302
Division General Detectives**

**Everett Deonte Lee
B/M, DOB 06/30/1994
Height 5' 7" , Weight 135.00 lbs.
BRO Eyes, BLK Hair
LA DL #10785637
363 Marshall Road
Pine Grove, LA 70453**

The above-named person was accused with having violated

LRS: 14(24):43/A - (Principles)Third Degree Rape/Anal (1 cts.)

By Lieutenant Tarik Mokdaf IBM# S2302

I, the affiant, detective lieutenant currently a commissioned deputy sheriff with the East Baton Rouge Sheriff's Office (EBRSO), wish to inform 19th Judicial District Court (JDC) that the 28-year-old accused, Everett Lee (B/M 06/30/1994), violated Louisiana Revised Statute (LRS) 14(24):43/A titled (principle) third degree rape/anal (1ct). The accused, Mr. Lee, violated the statute(s) mentioned above while in East Baton Rouge Parish and in the State of Louisiana.

On January 16, 2023 at approximately 1649 hours, I was tasked to assist our Traffic Division with a fatality investigation. On January 15, 2023 at approximately 0250 hours, the Traffic Division responded to a fatal crash on Burbank Drive within East Baton Rouge Parish. The victim, a 19-year-old female pedestrian, was struck by a vehicle while in the roadway. The victim was transported to a local hospital where she later succumbed to her injuries. I learned during the investigation that prior to the

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deadly crash, between 0100 hours and 0200 hours, the victim was seen leaving a local bar with four male subjects. I further learned that one of the subjects was identified as Casen Carver, the co-defendant.

At approximately 1810 hours on January 16, 2023, the co-defendant arrived at the Sheriff's Office Headquarters where he was verbally advised of his Miranda warning. The co-defendant voluntarily waived his right to an attorney and agreed to provide a statement.

Post Miranda, The co-defendant admitted that on January 15, 2023 he, his 17-year-old juvenile male friend, his 18-year-old friend, Mr. Kaivon Washington, and Mr. Washington's uncle, the accused, all went to a local bar located at 1176 Bob Pettit Blvd in East Baton Rouge Parish. The co-defendant admitted that while at the bar, he and his friends consumed alcoholic beverages. The co-defendant also admitted that the victim consumed alcoholic beverages while at the bar. The co-defendant denied knowing the victim or ever seeing her before. The co-defendant admitted that after he and the others were leaving the bar for the night, the victim walked with them. The co-defendant stated the victim was very unstable on her feet, was not able to keep her balance, and was unable to speak clearly without slurring her words. The co-defendant admitted he witnessed the victim and his 17-year-old juvenile friend as they were hugging and walking together. The co-defendant stated the victim asked for a ride home and he admitted that he agreed to give her the ride because he did not want to leave her while very intoxicated and the bar was closing. The co-defendant stated he asked the victim about her friends, but she was "drunk" and did not know where her friends were.

The co-defendant admitted that the victim got in his vehicle with his friends. The co-defendant stated he sat in the driver seat and Mr. Washington's uncle sat in the front passenger seat. The co-defendant stated his 17-year-old juvenile friend, the victim, and Mr. Washington sat in the rear seats. The co-defendant stated he asked the victim for her address, but she fell over and could not answer him. Mr. Carter admitted that he drove a short distance to a nearby street, possibly Jennifer Jean Drive, and parked. The co-defendant stated he overheard his 17-year-old juvenile friend as he asked the victim five times, if she wanted to have sex with him. The co-defendant stated the victim gave verbal consent to his 17-year-old juvenile friend. The co-defendant stated the victim and his 17-year-old juvenile had sex in the vehicle's rear seats. The co-defendant stated while his 17-year-old juvenile friend and

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the victim were having sex, Mr. Washington exited his vehicle. The co-defendant stated once his 17-year-old juvenile friend finished the sex act with the victim, Mr. Washington returned to the vehicle and his 17-year-old juvenile friend exited the vehicle.

The co-defendant admitted he heard Mr. Washington ask the victim numerous times if she wanted to have sex, and she consented. The co-defendant admitted Mr. Washington then had sex with the victim in the rear of the vehicle. The co-defendant admitted that he and Mr. Lee remained in the front seats of the vehicle while the sex acts were being performed with the victim. The co-defendant stated once he stated "we got to stop this, let's go," Mr. Washington and the victim stopped having sex and put their clothes on. The co-defendant stated he then drove away from the area and went to bring the victim home.

The co-defendant admitted while the sex acts were being performed with the victim, he felt uncomfortable and he "hated it." The co-defendant stated he thought the victim was "drunker" and her speech was slurred. During the interview, the co-defendant was asked if the victim was too impaired to consent to the sexual intercourse and he replied "I guess." The co-defendant stated they drove around attempting to locate where the victim lived and finally dropped her off in a subdivision.

On January 18, 2023, a post mortem examination of the victim's body was performed by the East Baton Rouge Parish Coroner's Office. During the autopsy, the pathologist reported that the victim had injuries consistent with previous sexual assault anally. It was also reported that the victim's urine sample collected at East Baton Rouge Parish Coroner's Office tested positive for Tetrahydrocannabinol (THC).

On January 19, 2023, I received a copy of the victim's medical records from the time of her admittance to the hospital on January 15, 2023. Per the medical records, a sample of the victim's blood was collected for Blood Alcohol Concentration (BAC) testing. The medical records showed the victim's blood alcohol content was .319g%. The medical records also showed that the victim's urine sample tested positive for Tetrahydrocannabinol (THC). According to University of Notre Dame Research, the effects of a BAC between .250g% and .399g% are listed as alcohol poisoning and

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loss of consciousness.

According to video footages obtained from said bar and the surrounding businesses, the victim was seen arriving at the bar at approximately 2206 hours (10:06pm). At approximately 2218 hours (10:18pm), the co-defendant and the others were seen arriving at the bar. Inside the bar, the victim and Mr. Carsen's 17-year-old juvenile friend were seen hugging and dancing. At approximately 0100 hours (1:00am), the victim was seen sitting on a stool by the counter at the bar. The victim was then seen getting up, adjusted her pants, and stumbled backwards. The victim got back on her feet with the help of three individuals. At approximately 0134 hours (1:34am), the victim was seen sitting on a bench by the entrance door. The victim was then seen getting up and fell. The co-defendant's 17-year-old juvenile friend was then seen walking towards the victim and removed her baseball cap. The victim was then seen grabbing the co-defendant's 17-year-old juvenile friend's hand while getting back on her feet.

At approximately 0149 hour (1:49am), the co-defendant, the victim, and the others were seen leaving the bar. At approximately 0151 hours (1:51am), the co-defendant, the victim, and the others were seen walking towards the location of their parked vehicle. At approximately 0154 hours (1:54am), the victim and the co-defendant's friends were seen getting in the vehicle. At approximately 0159 hours (1:59am), the vehicle was seen heading towards Nicholson Drive. Approximately fifty minutes later, the victim was involved in the deadly crash.

On January 21, 2023, I contacted the co-defendant's 17-year-old juvenile friend's mother. The mother stated she and her son did not want to provide a statement. I also contacted another co-defendant, Mr. Washington, at the Sheriff's Office Headquarters where he was verbally advised of his Miranda warning. The second co-defendant voluntarily waived his right to an attorney and agreed to provide a statement.

At the beginning of the interview, the second co-defendant expressed that he was sad about the victim's death and he stated "we were the last people she seen." The second co-defendant admitted that he and his friends left the bar with the victim and walked together towards their vehicle. The second co-defendant stated as he was

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walking behind the victim and his friends, he laughed and in his mind, he said "how y'all meet a random girl and just bring her home?" The second co-defendant also admitted that the victim did not have her balance and she stumbled. The second co-defendant stated while approaching their vehicle, the victim attempted to open a random vehicle's door. The second co-defendant stated he and his friends had to tell the victim that she was pulling on the wrong vehicle's door handle. The second co-defendant stated once they left the bar in the vehicle, he witnessed the victim and his 17-year-old juvenile friend as they touched each other's private area while in the vehicle. The second co-defendant stated his 17-year-old juvenile friend had his hand on the victim's vagina area over her clothing. The second co-defendant stated the victim also had her hand on his 17-year-old juvenile friend's penis area over her clothing. The second co-defendant denied witnessing sex between the victim and his 17-year-old juvenile friend and he denied having sex with the victim. The second co-defendant also stated the victim was drunk and he stated "liked when I tell you drunk, drunk, she was drunk." The second co-defendant also admitted that he and his friends dropped her off at a subdivision near the crash scene. The second co-defendant also admitted that his uncle went to the bar with him and his friend and he identified his uncle as Mr. Lee. Once the second co-defendant was asked for his reference oral DNA swab, he requested an attorney.

I contacted the accused, Mr. Lee, and he refused to meet in order to provide his statement. Mr. Lee positively identified himself and he voluntarily stated that he was in the passenger seat when the victim, his nephew, and his nephew's friends were in the vehicle.

I note that several search warrants were applied for and granted in reference to this investigation.

Based on the co-defendant's voluntary statements, the victim's medical findings, and the other co-defendant's statement including Mr. Lee, I request an arrest warrant be issued for Mr. Lee's arrest for violating LRS 14(24):43/A titled (principles) third degree rape/anal (1ct).

Affiant certifies under oath that the information contained herein to be true and correct to the best of my knowledge under penalties of perjury and request that a warrant of arrest of the accused be issued.

Tarik Mokdaf

AFFIANT

THUS DONE AND PASSED on this 22nd day of January 2023 at 03:13 PM.



BRAD MYERS
JUDGE, 19TH JDC
STATE OF LOUISIANA