

D I S M I S S A L M E M O R A N D U M

TO: Honorable Mitzy Galis-Menendez, J.S.C.

FROM: Assistant Prosecutor Colleen Hannon *CH*

RE: State v. Sean Ringgold  
Indictment No. 2245-12-2013  
Prosecutor File No. 13-2214

DATE: September 30, 2014

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1. I am the Assistant Prosecutor assigned to the above-entitled matter.
2. On November 20, 2013, this matter was presented to the Grand Jury for consideration. The Grand Jury returned an indictment against Sean Ringgold for two Criminal Sexual Contacts and Sexual Assault.
3. On July 28, 2014, Mr. Ringgold filed a Motion to Dismiss the Indictment for prosecutorial misconduct. Specifically, the Motion alleged that the conflicting statements given by the victim were withheld from the Grand Jury and that evidence demonstrating substantial credibility issues was also withheld leading to the Grand Jury being misled about the evidence in the case. Mr. Ringgold also alleged that the Grand Jury was not properly instructed on probable cause and that exculpatory information was withheld, namely the victim's incentive to fabricate based upon interviews she gave to the press about this incident.
4. The evidence presented at that time involved testimony from the victim regarding her interaction with Mr. Ringgold on the evening of June 25, 2013 and her sworn statement to the Secaucus Police Department.
5. Following presentation to the Grand Jury, materials tending to impeach the victim's credibility were received. Ms. Williamson was confronted on these inconsistencies and became

defensive with myself, Assistant Prosecutor De Los Reyes and Agent Jennifer Pelez.

6. In light of the pending motion, the matter was resubmitted to the Grand Jury on September 9, 2014. At that time the Grand Jury heard from the victim and she was confronted about the inconsistencies in her testimony. The Grand Jury heard from Sergeant Hawxhurst from the Secaucus Police Department. The Sergeant read the victim's original statement and testified concerning the investigation.
7. The Grand Jury deliberated and delivered a no cause after hearing the evidence.
8. Based on the foregoing, it is the State's recommendation that Indictment 2245-12-2013 be DISMISSED.

Respectfully submitted,

GAETANO T. GREGORY (022261978)  
Acting Prosecutor of  
Hudson County

By: Colleen Hannon  
COLLEEN HANNON (043761998)  
Assistant Prosecutor

I concur in the above recommendation.

Debra Simon  
DEBRA SIMON  
Deputy First Assistant Prosecutor