

ilDEFENDANT: Randy Perez-Coiscou
DOB: 05/04/2002 AGE: 21
ADDRESS:
10 Chestnut St.
Springfield, MA 01103

ARRAIGNMENT DATE: July 5, 2023
SA CASE ID.: 23-10357
ASSIGNED (D)SA: Ian Sullivan ERN:
POLICE DEPT.: VSP-Headquarters
INVESTIGATING OFC: Det. Sgt. Isaac Merriam
VICTIM ADVOCATE: Alessandra Gaiotti
INCIDENT NO.: 23B4004073

STATE OF VERMONT

SUPERIOR COURT
RUTLAND UNIT

STATE OF VERMONT

CRIMINAL DIVISION

v.

DOCKET NO.

RANDY PEREZ-COISCOU

INFORMATION BY STATE'S ATTORNEY

By the authority of the State of Vermont, the State's Attorney for Rutland County, upon the oath of office charges:

COUNT 1 OF 2

CHARGE CODE: 13v1024a2&1028a1 | CODE ID: 141 | OFFENSE CLASS: F

CHARGE NAME: Aggravated Assault on a Law Enforcement Officer- Bodily Injury with a Deadly
Weapon

Randy Perez-Coiscou, in the County of Rutland, at Rutland on or about July 3, 2023, attempted to cause or purposely or knowingly caused bodily injury with a deadly weapon to a law enforcement officer performing a lawful duty (by driving a car at Sgt. Plemmons of the Rutland City Police Department while Sgt. Plemmons was standing in front of the car), in violation of 13 V.S.A. § 1024(a)(2) and 13 V.S.A. § 1028(a)(1).

Penalty: Imprisoned not more than 16 years or fined not more than \$10,000.00 or both.

COUNT 2 OF 2

CHARGE CODE: 13v1024a2&1028a1 | CODE ID: 141 | OFFENSE CLASS: F

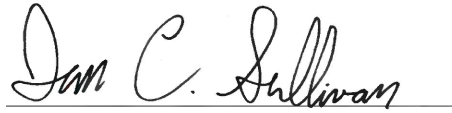
CHARGE NAME: Aggravated Assault on a Law Enforcement Officer- Bodily Injury with a Deadly
Weapon

Randy Perez-Coiscou, in the County of Rutland, at Rutland on or about July 3, 2023, attempted to cause or purposely or knowingly caused bodily injury with a deadly weapon to a law enforcement officer performing a lawful duty (by driving away while Ofc. Radja's person was partially within the driver's compartment of the defendant's car), in violation of 13 V.S.A. § 1024(a)(2) and 13 V.S.A. § 1028(a)(1).

Penalty: Imprisoned not more than 16 years or fined not more than \$10,000.00 or both.

Against the peace and dignity of the State.

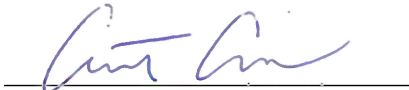
DATED: July 5, 2023



Ian C. Sullivan
State's Attorney

This information has been presented to me and I have found probable cause.

DATED: 7/5/2023



Superior Court Judge

The State moves this Honorable Court to hold the defendant without bail until trial, pursuant to 13 V.S.A. § 7553a. See accompanying motion.



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STATE OF VERMONT
RUTLAND COUNTY §

Case #23B4004073

Now comes **Detective Sergeant Isaac Merriam, Affiant**, being duly sworn and on oath, deposes and says that he has probable cause to believe **Randy Perez Coiscou (DOB: 05/04/2002)**, has committed the offense(s) of **Aggravated Assault (x2)** a violation of **Title 13 Vermont Statutes Annotated 1024**.

1. The undersigned being duly sworn, deposes and says that I, Detective Sergeant Isaac Merriam am now and have been a police officer in the State of Vermont since November of 2016. I am currently a full-time employee of the Vermont State Police, being presently assigned as a Detective Sergeant with the Major Crime Unit.
2. The information contained within this affidavit is based upon my investigation, training, and experience, as well as information conveyed to me during the course of this investigation that I learned directly from Vermont State Police Troopers, and Rutland City Police Officer's named herein for purposes of this Affidavit. The law enforcement personnel I spoke with have advised me that they believe the information to be true and accurate.

July 3, 2023, Giorgetti Park, Rutland, Vermont

3. On July 3, 2023, at approximately 2112 hours, I was notified by Vermont State Police Major Crime Unit Detective Lieutenant Eric Albright of an officer involved shooting in Rutland City, Vermont. I was instructed to respond to the Vermont State Police Barracks in Rutland to assist in this investigation.
4. Upon my arrival, at approximately 2350 hours, I received a briefing from Det. Lt. John-Paul Schmidt and learned the following information.
5. On July 3, 2023, at approximately 2029 hours, Rutland City Police Department (RCPD) K9 Officer James Rajda, and civilian ride-along, Brandon Woodard (DOB: 10/27/85) encountered a suspicious black Infiniti FX35 SUV, bearing Massachusetts registration 2EBF82 parked at Giorgetti Park in Rutland City, VT. Ofc. Rajda had previous law enforcement interactions with this vehicle and registered owner, Randy Alexander Perez Coiscou (DOB: 05/04/2002) of Springfield, MA, on May 26, 2023, in Rutland City.
6. Ofc. Rajda identified the occupants of the Infiniti at Giorgetti Park as Randy Alexander Perez Coiscou and his twin brother Andy Perez Coiscou (DOB: 05/04/2002). RCPD Sgt. Andrew Plemmons responded to Giorgetti Park to back up Ofc. Rajda. During this encounter law enforcement notified dispatch at approximately 2038 hours that shots were fired, and the black Infiniti left the park, leaving Randy behind. At approximately 2040 hours RCPD Cpl Tyler Tavaras witnessed the Infiniti crash into the woods off Oak Street Extension and took Randy's brother, Andy into custody. Ambulance crews were dispatched to both the Park and Oak Street Extension. Randy and Andy Perez Coiscou sustained gunshot wounds and were ultimately transported to The University of Vermont Medical Center.



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7. Ofc. Rajda was evaluated by medical personnel for noticeable arm and chin lacerations. Det. Sgts. Tyson Kinney and James Vooris photographed Ofc. Rajda's injuries and conducted a firearms round count for both Ofc. Ryda and Sgt. Plemmons.

Brandon Woodard Interview

8. On July 3, 2023, at approximately 2359 hours, Vermont State Police Major Crime Unit Detective Sergeants Tyson Kinney and James Vooris conducted an interview with Brandon Woodard (DOB: 10/27/85) at the Rutland City Police Department. I learned the following information from Det. Sgt. Kinney.
9. Woodard stated he was participating on a ride-along with the Rutland City Police Department. He advised he began the ride-along at 1830 hours and was assigned to ride with Ofc. James Rajda and his canine partner. During the ride-along, Woodard rode in the front passenger seat of Rajda's vehicle.
10. The two answered calls and conducted motor vehicle enforcement until approximately 2030 hours, when they entered Giorgetti Park, located on Oak Street Extension.
11. When they pulled down next to the baseball field, they noticed what appeared to be two vehicles parked in the parking lot. One vehicle was identified as a silver "crummy Corolla" and the other was identified as a black Infiniti.
12. When Ofc. Rajda saw the black infinity, he recognized it as being a vehicle he was familiar with and stated to Woodard that the subjects inside were "bad people" and to pay attention.
13. Ofc. Rajda exited the vehicle and made contact with the operator. At this time, Woodard stated he could not hear what was being said, but advised he overheard Ofc. Rajda radio the operator's license and registration for the vehicle. At this time, Ofc. Rajda called for an additional unit.
14. Woodard stated the "Sarge" arrived and began standing by observing what was occurring. Ofc. Rajda came back to the vehicle and retrieved his Canine and deployed the dog around the black Infiniti vehicle. After the canine deployment was completed, Ofc. Rajda returned and put the canine back inside the vehicle. Ofc. Rajda then returned to the vehicle and began conversing with the operator again. Woodard could not hear what was being conversed between Ofc. Rajda and the operator.
15. Ofc. Rajda began to open the driver's side door and Woodard noticed the vehicle appeared to be rolling forward. The "Sergeant" was standing directly in front of the black Infiniti. As the vehicle began rolling, Woodard overheard the "Sergeant" yelling "stop the car or I'll shoot." The car continued rolling forward and the "Sergeant" fired approximately 2-3 times. As this was occurring, Ofc. Rajda was attempting to forcibly remove the operator from the vehicle. The operator was identified as wearing a black hooded sweatshirt and the passenger was identified as wearing a white shirt.
16. The vehicle rolled away and out of sight from Woodard's view alongside the police vehicle. It was at this time, Woodard described hearing another volley of fire of approximately 2-3 more shots.



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17. Woodard described not being able to see the ground directly in front of the police vehicle and noticed Ofc. Rajda drew his firearm and pointed it at the driver. Woodard did not know the operator had exited the vehicle until he observed Ofc. Rajda pointing his firearm at the male on the ground.
18. While pointing his firearm at the male, Ofc. Rajda was overheard yelling, "Stop reaching for your waist" and "stop what you are doing." The male was then handcuffed.
19. Ofc. Rajda ran to the rear of the vehicle and retrieved the first aid kit. Ofc. Rajda asked Woodard to exit the vehicle and assist them in first aid of the operator.
20. Woodard stated he observed what appeared to be a gunshot wound that entered the right upper arm and traveled into the armpit area of the male. Both officers began administering first aid by applying a chest seal and a tourniquet to the male operator.
21. It was Woodard's opinion the passenger in the vehicle climbed into the driver's seat and drove the vehicle away. At the conclusion of this interview, Woodard was sworn to his statement.

RCPD Cpl Tyler Tavaras Interview

22. On July 4, 2023, at approximately 00:41 hours, Det. Tpr. Cody Allison and Det. Sgt. Francis LaBombard conducted an interview with Cpl Tyler Tavares (DOB: 05/21/92) at the Rutland City Police Department. I learned the following information from Det. Sgt. LaBombard.
23. Cpl. Tavares was working a patrol shift on July 3, 2023. During his shift, Cpl. Tavares overheard Ofc. Rajda's radio traffic that he was out checking on a vehicle parked the lower parking lot at Giorgetti Park. Cpl. Tavares stated Sgt. Plemmons responded to the area to back-up Ofc. Rajda, because Ofc. Rajda stated he was going to deploy his canine on the vehicle. Cpl. Tavares stated he also responded to the area and waited in the upper parking lot. Cpl. Tavares was not able to see Ofc. Rajda or Sgt. Plemmons where he was parked. Cpl. Tavares wanted to be close in case he was needed. Cpl. Tavares stated the park is a place they frequently patrol and check on due to drug activity that occurs in the parking lot.
24. While parked in the upper lot for approximately ten minutes, Cpl. Tavares stated he heard several gun shots coming from the lower parking lot and then heard an officer say, "Shots fired" over the radio. Cpl. Tavares was not able to recall how many shots he heard but they were in succession. Cpl. Tavares then proceeded towards the area where Ofc. Rajda and Sgt. Plemmons were. Cpl. Tavares stated the access road to the area only has one entry point. When he was heading towards the area, he observed a vehicle traveling towards him at a fast speed. Cpl. Tavares stated he traveled past the vehicle and then immediately turned around to initiate a motor vehicle stop. Cpl. Tavares activated his blue lights and siren at this time while attempting to stop the vehicle. Cpl. Tavares was not able to see anyone in the vehicle as it traveled by him. Cpl. Tavares stated he believed this was the vehicle involved in the incident. based on the timeframe of hearing the gunshots, the radio traffic of shots fired and the location he observed the vehicle traveling from.



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25. As the vehicle traveled past him, Cpl. Tavares stated he was ducking down because he did not know if they were armed or not and he did not want to have rounds come at him. Cpl. Tavares stated while he was attempting to stop the vehicle, he was able to stay in close proximity to it and described it as an SUV. Cpl. Tavares pursued the vehicle from the lower parking lot access road towards Oak Street Extension, which he knew was a dead end.
26. As Tavares was traveling behind the vehicle, he observed the vehicle approaching the end of the road and then drive into the wood line. Cpl. Tavares stated the vehicle came to a stop when it struck a tree. Cpl. Tavares stated he was able to activate his body camera once he exited his vehicle and encountered the driver. Cpl. Tavares observed the driver exit the vehicle and drew his duty weapon. Cpl. Tavares detained the driver at gunpoint while he gave him verbal commands, ordering him to the ground. Cpl. Tavares stated the driver was bleeding and appeared to have sustained injuries to the left side of his face under his eye and an injury to his left wrist. Cpl. Tavares reported the driver was compliant.
27. Once the driver was in custody, Cpl. Tavares looked in the vehicle from the outside to see if anyone else was inside. Cpl. Tavares did not see anyone in the vehicle and stated the passenger side door was up against a tree and someone could not have exited the passenger side. Cpl. Tavares stated once the driver was in custody, Det Lucia, Det Billings, Ofc's Rice and Dungal arrived on scene. Cpl. Tavares stated rescue also arrived and began treating the driver for his injuries.
28. Cpl. Tavares stated the driver made several statements he was shot and that he did not want to die. Cpl. Tavares stated the driver made other statements during that time however he could not recall anything specific that he said. Cpl. Tavares stated he did not see any weapons on the driver, and he didn't see anything in the vehicle when he looked quickly from outside the vehicle.

Crime Scene

29. The Vermont State Police Crime Scene Search Team (CSST) responded to Giorgetti Park and assumed command of two scenes. These scenes consist of the lower parking lot of Giorgetti Park and the immediate location where the Infiniti crashed on Oak Street Extension. At this time, these scenes have not yet been fully processed. At approximately 0200 hours on July 4, 2023, I conducted a scene walk through and noted the following items of interest.
30. In Giorgetti Park, I observed four spent shell casings, a trauma kit, and torn clothing with RBS. On Oak Street Extension, I observed skid marks leading to a black Infiniti FX35 bearing Massachusetts registration 2EBF82 bearing VIN#: JNRAS18W09M152606 registered to Randy Perez Coiscou. Suspected bullet holes were observed in the windshield and drivers-side door. Red brown stains (RBS) were located on the exterior and interior of the vehicle. On the ground just outside of the driver-side door was a plastic baggie containing a suspected two half bundles (50 individually bagged glassine bags) of suspected heroin and/or fentanyl.
31. This vehicle was eventually transported from the scene to the impound lot at the Rutland Barracks. Upon further inspection, a similar package of shape and size of suspected heroin and/or fentanyl was observed on the wiper control arm.



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Randy Perez Coiscou Interview

32. On July 4, 2023, Det. Sgt. James Vooris interviewed Randy Perez Coiscou. Det. Sgt. Vooris provided me with the following information. Randy stated that he and his brother, Andy drove someone from Springfield, MA to Rutland, VT. Randy described he was operating his vehicle as hired fare. Randy stated after he dropped that individual off, he and Andy went to the Park looking to see if anyone needed a ride. Randy reported that the police drove in and he recognized the Officer from prior law enforcement interactions. Randy stated that the officer asked for identification and the officer ran his credentials. Randy advised that the officer ran his canine around his vehicle and asked to search it. Randy stated that the officer unholstered his gun and stuck it in his face. Randy reported that there was a scuffle, and he accidentally started his car. Randy stated his car is not moving when the officer shot. Randy stated he fell out of his vehicle and when he did he may have moved the shifter into drive. Randy believed he was run over.

Initial Review of RCPD Cruiser/Body Worn Cameras

33. The Vermont State Police obtained video/audio footage from the Rutland City Police Department surrounding the events described above. Upon initial review of the footage obtained, I made the following observations.
34. Ofc. Rajda and Sgt. Plemmons were interacting with a parked black Infiniti SUV with Massachusetts registration occupied by two males at the lower lot of Giorgetti Park. During this interaction, Ofc. Rajda deployed his drug detection canine. The canine was returned to Ofc. Rajda's cruiser and Ofc. Rajda informed the operator his canine indicated to the odor of narcotics in the vehicle and asked the operator for consent to search the vehicle. Consent was denied by the operator who is believed to be Randy.
35. Ultimately Ofc. Rajda ordered the driver of the vehicle, during which time Ofc. Rajda opened the driver's door. The operator is seen reaching forward toward the dash and the vehicle can be heard starting. Sgt. Plemmons is seen standing directly in front of the Infiniti when the vehicle begins to move forward, striking him. Ofc. Rajda was partially inside the drivers compartment of the vehicle at this time. I observed Sgt. Plemmons pointing his firearm at the operator of the Infiniti. When the vehicle begins to travel forward, Sgt. Plemmons discharged his sidearm several times. Ofc. Rajda quickly moved out of the way narrowly avoiding being struck/dragged.
36. Sgt. Plemmons follows the vehicle a short distance on foot. The passenger is seen at this time on Sgt. Plemmons body camera moving into the driver's seat. Sgt. Plemmons discharged his sidearm approximately two more times before the Infiniti speeds out of the lower parking lot of Giorgetti Park.



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Based on the facts and circumstances above, I have probable cause to believe **Randy Perez Coiscou (DOB: 05/04/2002)** has committed the crime of **Aggravated Assault (x2)**, a violation of **Title 13 Vermont Statutes Annotated 1024**.

Sworn to me before this
4th day of July, 2023.


Notary Public


Isaac Merriam
SERGEANT
VERMONT STATE POLICE
MAJOR CRIME UNIT