

SUPERIOR COURT  
OF THE  
DISTRICT OF COLUMBIA

Holding a Criminal Term

Grand Jury Sworn in on October 27, 2008

THE UNITED STATES OF AMERICA	:	Criminal No:	2008CF1027068
	:		2008CF1026996
v.	:		2008CF1026997
	:		
JOSEPH PRICE	:	Violations:	
PDID: 618-012	:		
DYLAN WARD	:	22 D.C. Code, Section 22-1805(a);	
PDID: 618-244	:	22 D.C. Code, Section 722(a)(6);	
VICTOR ZABORSKY	:	22 D.C. Code, Section 723	
PDID: 618-050	:		
	:	(Conspiracy; Obstructing Justice;	
	:	Tampering with Evidence)	
	:		
	:		

The Grand Jury charges:

FIRST COUNT:

CONSPIRACY

Between on or about August 2, 2006, and on or about November 21, 2008, defendants Joseph Price, Dylan Ward, and Victor Zaborsky, did unlawfully combine, conspire, confederate, and agree to obstruct justice in connection with the homicide of Robert Wone by altering and orchestrating the crime scene, disposing of, altering, and planting evidence, and lying to law enforcement authorities and others about the true circumstances surrounding the homicide of Robert Wone, in violation of 22 D.C. Code 722 (2001 ed.).

THE OBJECT OF THE CONSPIRACY

It was the primary object of the conspiracy for the defendants to conceal from the authorities and others the true circumstances surrounding the homicide of Robert Wone, which occurred on or about August 2, 2006, at 1509 Swann Street, Northwest, Washington, D.C.

BACKGROUND

Prior to August 2, 2006, Robert Wone, a college friend of Joseph Price, had arranged with defendant Price to spend the night at defendant Price's house located at 1509 Swann Street, Northwest, Washington, D.C. During the evening hours of August 2, 2006, Robert Wone arrived at 1509 Swann Street and entered the residence. Some time after Robert Wone entered the residence, Robert Wone was killed inside the residence.

### OVERT ACTS OF THE CONSPIRACY

During the course of and in furtherance of the conspiracy and to effect the object thereof, defendants Price, Ward, and Zaborsky, individually and in combination, did commit the following overt acts, among others, within the District of Columbia:

1. The defendants, individually or in combination, cleaned the crime scene as well as the body of Robert Wone.
2. The defendants, individually or in combination, made up the bed in the guestroom located on the second floor in the front portion of the residence.
3. Thereafter, the defendants, individually or in combination, placed the body of Robert Wone on the bed in the guestroom.
4. In an effort to avoid detection and misdirect law enforcement authorities and others, the defendants endeavored to orchestrate the crime scene to make it appear as if an intruder had entered through the back door of the residence, retrieved a knife from the kitchen of the residence, traveled to the second floor of the residence, stabbed Robert Wone, and then fled the residence.
5. The defendants, individually or in combination, retrieved a knife from a knife set located on the kitchen counter of the residence.
6. The defendants, individually or in combination, used a white, cotton towel to place Robert Wone's blood on the knife that had been retrieved from the kitchen.
7. The defendants, individually or in combination then carefully placed the bloody knife on the night stand located beside the bed in the guestroom.
8. The defendants constructed and coordinated the fabricated story they would tell the law enforcement authorities about an intruder killing Robert Wone.

9. At approximately 11:49 p.m., on August 2, 2006, which was a considerable period of time after the fatal wounds had been inflicted on Robert Wone, defendant Zaborsky then placed a call to 9-1-1 and related, in part, the story that the defendants had fabricated and agreed to tell to law enforcement authorities.
10. While speaking with the 9-1-1 operator, defendant Zaborsky communicated that his partner, defendant Price, was using a towel to apply pressure to Robert Wone's wounds.
11. At approximately 11:54 p.m. on August 2, 2006, emergency medical personnel arrived and entered the residence at 1509 Swann Street. As the first paramedic reached the second floor he encountered defendant Ward, who was coming from the area of the second floor bathroom. The paramedic asked defendant Ward what was going on. Ward did not answer the paramedic but instead turned and walked into his bedroom.
12. The paramedic then approached the guestroom in which Robert Wone was located. Defendant Price was seated on the bed and was not applying pressure to Robert Wone's wounds. The paramedic asked defendant Price what was going on, to which defendant Price replied, "I heard a scream." Defendant Price then got up and moved away from the bed.
13. On August 3, 2006, defendant Price made statements to law enforcement authorities that were false in material respects and intended to misdirect and mislead law enforcement authorities into believing that an unknown intruder had, in fact, killed Robert Wone.
14. On or about August 3, 2006, defendant Price concealed from law enforcement authorities that his brother, Michael Price, had keys to the residence at 1509 Swann Street.
15. On August 3, 2006, defendant Ward made statements to law enforcement authorities that were false in material respects and intended to misdirect and mislead law enforcement

authorities into believing that an unknown intruder had, in fact, killed Robert Wone.

16. On August 3, 2006, defendant Zaborsky made statements to law enforcement authorities that were false in material respects and intended to misdirect and mislead law enforcement authorities into believing that an unknown intruder had, in fact, killed Robert Wone.
17. In or about November, 2007, defendant Price falsely told Robert Wone's widow, Katherine Wone, that he had in fact given law enforcement authorities the names of workers and/or contractors who had keys to the residence at 1509 Swann Street. However, defendant Price declined to tell Katherine Wone that his brother Michael Price possessed keys to the residence at 1509 Swann Street.

(Conspiracy, in violation of 22 D.C. Code Section 1805a (2001 ed.)).


SECOND COUNT:

From on or about August 2, 2006 through on or about November 21, 2008, within the District of Columbia, Joseph Price, Dylan Ward, and Victor Zaborsky, corruptly obstructed and impeded, and endeavored to obstruct and impede, the due administration of justice in an official proceeding, namely the criminal investigation into the murder of Robert Wone.

(Obstructing Justice, in violation of 22 D.C. Code, Section 722(a)(6))

THIRD COUNT:

On or about August 2, 2006, within the District of Columbia, Joseph Price, Dylan Ward, and Victor Zaborsky, altered, destroyed, mutilated and concealed objects and items, that is, blood and bloody items, a knife, and items used to clean the scene of the homicide, knowing or having reason to believe that an official proceeding was likely to be instituted, with the intent to impair the integrity and availability of that evidence for use in the official proceeding. (Tampering With Physical Evidence, in violation of 22 D.C. Code, Section 723)

  
JEFFREY A. TAYLOR  
Attorney of the United States in  
and for the District of Columbia

A TRUE BILL:

Foreperson.