



# Supreme Court of Guam

Guam Judicial Center • 120 West O'Brien Drive, Ste. 300 • Hagåtña, Guam 96910

Telephone: (671) 475-3162 • Facsimile: (671) 475-3140

Website: <http://www.guamcourts.gov>

E-mail: [justice@guamcourts.gov](mailto:justice@guamcourts.gov)



## PRESS RELEASE

FOR IMMEDIATE RELEASE – May 15, 2026 – Today, the Supreme Court of Guam issued an opinion in *People of Guam v. Ben Castro Crisostomo*, 2026 Guam 4, authored by Chief Justice Katherine A. Maraman and joined by Associate Justice F. Philip Carbullido and Associate Justice Robert J. Torres.

Defendant-Appellant Ben Castro Crisostomo appealed his convictions for aggravated assault, terrorizing, misdemeanor child abuse, and misdemeanor family violence. The case arose from an incident where Crisostomo's domestic partner hit Crisostomo on the head with a hammer. Crisostomo argued that his partner fabricated allegations of abuse against him to justify her attack with the hammer. Representing Crisostomo, the Alternate Public Defender's Office ("APD") claimed that the alleged victim made nearly identical allegations against her former partner, previously represented by APD. APD moved to withdraw based on a conflict of interest, but the trial court denied the motion. At trial, APD did not use the victim's complaint against her former partner for impeachment.

The Supreme Court reversed Crisostomo's convictions and remanded for new proceedings. The court concluded that APD had an actual conflict of interest for which prejudice is presumed. The Supreme Court held that APD's previous representation of the victim's former partner was directly relevant to Crisostomo's case. It opined that APD possessed confidential information from its earlier representation of the former partner created a barrier to a full defense of Crisostomo. Namely, APD failed to use the victim's complaint against her former partner despite apparent opportunities to do so. The Supreme Court considered the conflict imputed to the entire APD's office. The Supreme Court held that the trial court erred in denying the APD's motion to withdraw because it had an actual conflict of interest which amounted to a violation of Crisostomo's Sixth Amendment right to counsel and warranted reversal of his convictions and a new trial.

For more information, contact Suzane Santiago-Hinkle at [sshinkle@guamcourts.gov](mailto:sshinkle@guamcourts.gov).