

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

CR 13-258 RHK/LIB

UNITED STATES OF AMERICA,	)	
	)	INDICTMENT
Plaintiff,	)	
	)	18 U.S.C. § 113(a)(7)
v.	)	18 U.S.C. § 117
	)	18 U.S.C. § 1151
ALAN DAVID LAJEUNESSE, Jr.,	)	18 U.S.C. § 1153(a)
	)	
Defendant.	)	

THE UNITED STATES GRAND JURY CHARGES THAT:

**COUNT 1**

(Domestic Assault by an Habitual Offender)

On or about February 22, 2013, in the State and District of Minnesota, and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

**ALAN DAVID LAJEUNESSE, Jr.,**

an Indian, who had previously been convicted on at least 2 prior separate occasions in Federal, State, or Indian tribal court for offenses that would be, if subject to Federal jurisdiction, any assault, sexual abuse, and serious violent felony against a spouse or intimate partner and an offense under Chapter 110A, the Interstate Domestic Violence and Stalking laws, namely:

Offense	Court of Conviction	Date of Conviction (on or about)
Criminal Domestic Violence	Red Lake Tribal Court	December 3, 2003
Criminal Domestic Violence	Red Lake Tribal Court	April 21, 2004
Domestic Violence – Assault 2 <sup>nd</sup> Degree	Red Lake Tribal Court	January 9, 2007



United States v. Alan David Lajeunesse, Jr.

<b>Offense</b>	<b>Court of Conviction</b>	<b>Date of Conviction (on or about)</b>
Domestic Violence – Assault 2 <sup>nd</sup> Degree	Red Lake Tribal Court	July 12, 2007
Domestic Violence – Assault 2 <sup>nd</sup> Degree	Red Lake Tribal Court	June 20, 2008
Criminal Domestic Violence	Red Lake Tribal Court	August 11, 2009

did commit a domestic assault against G.A.L., also an Indian, the defendant's spouse and with whom the defendant shares children in common, resulting in substantial bodily injury, in violation of Title 18, United States Code, Sections 117 and 1151.

**COUNT 2**

(Assault Resulting in Substantial Bodily Injury)

On or about February 22, 2013, in the State and District of Minnesota, and within the exterior boundaries of the Red Lake Indian Reservation, the defendant,

**ALAN DAVID LAJEUNESSE, Jr.,**

an Indian, did assault G.A.L., a spouse and intimate partner, resulting in substantial bodily injury, in violation of Title 18, United States Code, Sections 113(a)(7), 1151, and 1153(a).

A TRUE BILL

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ACTING UNITED STATES ATTORNEY

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FOREPERSON