

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

JAN 12 2011 *ds*

FOR THE DISTRICT OF NEW MEXICO

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 ALPHONSO CHAVEZ,)
)
 Defendant.)

CRIMINAL NO. 11-73
Count 1: 18 U.S.C. §§ 1153,
2241(c) and 2246(2)(D):
Aggravated Sexual Abuse;
Count 2: 18 U.S.C. §§ 1153,
2242(1) and 2246(2)(D): Sexual
Abuse.

INDICTMENT

The Grand Jury charges:

Count 1

On or between January 1, 2006 and May 31, 2006, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **ALPHONSO CHAVEZ**, an Indian, did knowingly engage in and attempt to engage in a sexual act with Jane Doe, a person known to the grand jury, who had not attained the age of 12 years, and the sexual act consisted of the intentional touching, not through the clothing, of the genitalia of Jane Doe with the intent to abuse, humiliate, harass and degrade Jane Doe and arouse and gratify the sexual desire of the defendant.

In violation of 18 U.S.C. §§ 1153, 2241(c) and 2246(2)(D).

Count 2

On or between March 1, 2008 and May 27, 2008, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **ALPHONSO CHAVEZ**, an Indian, did knowingly engage in a sexual act with Jane Doe, a person known to the grand jury,

who had not attained the age of 16 years, by placing her in fear, and the sexual act consisted of the intentional touching, not through the clothing, of the genitalia of Jane Doe with the intent to abuse, humiliate, harass and degrade Jane Doe and arouse and gratify the sexual desire of the defendant.

In violation of 18 U.S.C. §§ 1153, 2242(1) and 2246(2)(D).

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY



Assistant United States Attorney

q/10/11 01/07/11 1:11pm