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UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

MAY 1 1 2010

IN THE DISTRICT COURT OF THE UNITED STATES

FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

VS.

RAYMOND JOSEPH MARTIN,

Defendant.

MATTHEW J. DYKMAN Criminal No. <u>10-1358 M</u>CA

Counts 1 and 2: 18 U.S.C. §§ 1153, 2244(a)(5) and 2246(3): Abusive Sexual Contact;

Count 3: 18 U.S.C. §§ 1153, 2241(c) and 2246(2)(C): Aggravated Sexual Abuse of a Child.

INDICTMENT

The Grand Jury charges:

Count 1

On or between December 1, 2008, and December 31, 2008, in Indian Country, in Sandoval County, in the District of New Mexico, the defendant, **RAYMOND JOSEPH MARTIN**, an Indian, did knowingly engage in sexual contact with Jane Doe, a child known to the grand jury who had not then attained the age of twelve years, in that he intentionally touched, either directly or through the clothing, her genitalia, with an intent to abuse, humiliate, harass, degrade and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2244(a)(5) and 2246(3).

<u>Count 2</u>

On or between March 29, 2009, and February 11, 2010, in Indian Country, in Sandoval County, in the District of New Mexico, on a date separate and distinct from that contained in Count 3, the defendant, **RAYMOND JOSEPH MARTIN**, an Indian, did knowingly engage in sexual contact with Jane Doe, a child known to the grand jury who had not then attained the age of twelve years, in that he intentionally touched, either directly or through the clothing, her genitalia, with an intent to abuse, humiliate, harass, degrade and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2244(a)(5) and 2246(3).

Count 3

On or between March 29, 2009 and February 11, 2010, in Indian Country, in Sandoval County, in the District of New Mexico, on a date separate and distinct from that contained in Count 2, the defendant, **RAYMOND JOSEPH MARTIN**, an Indian, knowingly engaged in a sexual act with Jane Doe, a child known to the grand jury who had not then attained the age of twelve years, and the sexual act consisting of penetration, however slight, of the genital opening of Jane Doe by the defendant's hand or finger, with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

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

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

Assistant United States Attorney