

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

JUN 10 2010

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

WILLIS YAZZIE,

Defendant.

CRIMINAL NO. 10cr 1761 JB

Count 1: 18 U.S.C. §§ 1153,
2241(c) and 2246(2)(C): Aggravated
Sexual Abuse;

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

INDICTMENT

The Grand Jury charges:

Count 1

On or about between March 1, 2010, and March 31, 2010, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **WILLIS YAZZIE**, an Indian, did knowingly engage in a sexual act with Jane Doe 1, a person known to the grand jury, who had attained the age of 12 years but had not attained the age of 16 years and was at least four years younger than the defendant, by using force, and the sexual act consisted of the penetration, however slight, of the genital opening of Jane Doe 1 by a hand or finger or by any object, with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person.

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

Count 2

On or about between April 1, 2010, and April 30, 2010, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **WILLIS YAZZIE**, an Indian, did

knowingly engage in a sexual act with Jane Doe 2, 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 another person under the age of 16 years with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person

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

A TRUE BILL:

/s/
FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

06/04/10 12:49pm