

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

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LEANDER VALDO,

Defendant.

CRIMINAL NO. 09-2785

Count 1: 18 U.S.C. §§ 1153,
2242(1) and 2246(2)(C):
Aggravated Sexual Abuse;

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

INDICTMENT

The Grand Jury charges:

Count 1

On or between January 3, 2006 and May 26, 2006, in Indian Country, in Cibola County, in the District of New Mexico, the defendant, **LEANDER VALDO**, an Indian, did knowingly engage in a sexual act with Jane Doe, a person known to the grand jury, by threatening or placing Jane Doe in fear, and the sexual act consisted of the penetration, however slight, of the genital opening of Jane Doe by the defendant's finger, with an 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)(C).

Count 2

On or between January 3, 2006 and May 26, 2006, in Indian Country, in Cibola County, in the District of New Mexico, the defendant, **LEANDER VALDO**, an Indian, did

knowingly engage in and cause sexual contact with Jane Doe, a person known to the grand jury, by threatening or placing Jane Doe in fear, and the sexual contact consisted of the intentional touching of the buttocks and breast of Jane Doe, with an 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, 2244(a)(2) and 2246(3).

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

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