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EASTERN DISTRICT OF CALIFORNIA

6 Attorneys for Plaintiff
7 United States of America

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9 IN THE UNITED STATES DISTRICT COURT
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11 EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

CASE NO. 1:22-CR-00213-DAD-BAM

13 Plaintiff,

14 v.
15 18 U.S.C. § 2241(a)(1) –Aggravated Sexual Abuse
CHARLES BARRETT,
Defendant.

(TWO COUNTS); 18 U.S.C. § 2244(b) (ONE
COUNT); 18 U.S.C. §§ 2253(a)(2) and 2253(a)(3) –
Criminal Forfeiture

16
17
18 I N D I C T M E N T

19 COUNT ONE: [18 U.S.C. § 2241(a)(1) –Aggravated Sexual Abuse]

20 The Grand Jury charges: T H A T

21 CHARLES BARRETT,

22 defendant herein, on or about August 13, 2016, in Yosemite National Park, in the Eastern District of
23 California and in the special maritime and territorial jurisdiction of the United States, did knowingly
24 cause K.G. to engage in sexual acts, specifically, contact between the penis and the anus, and contact
25 between the penis and vulva, by using force against K.G.

26 All in violation of Title 18, United States Code, Section 2241(a)(1).

1 COUNT TWO: [18 U.S.C. § 2244(b) –Abusive Sexual Contact]

2 The Grand Jury further charges: T H A T

3 CHARLES BARRETT,

4 defendant herein, on or about August 14, 2016, in Yosemite National Park, in the Eastern District of
5 California and in the special maritime and territorial jurisdiction of the United States, did knowingly
6 engage in sexual contact with K.G. without K.G.’s permission, specifically by causing penetration of the
7 genital opening of another with a finger, and with the intent to abuse, humiliate, degrade, harass, arouse,
8 and gratify the sexual desire of any person.

9 All in violation of Title 18, United States Code, Section 2244(b).

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11 COUNT THREE: [18 U.S.C. § 2241(a)(1) –Aggravated Sexual Abuse]

12 The Grand Jury further charges: T H A T

13 CHARLES BARRETT,

14 defendant herein, on or about August 14, 2016, in Yosemite National Park, in the Eastern District of
15 California and in the special maritime and territorial jurisdiction of the United States, did knowingly
16 cause K.G. to engage in sexual acts, specifically, contact between the penis and the vulva, by using force
17 against K.G.

18 All in violation of Title 18, United States Code, Section 2241(a)(1).

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20 FORFEITURE ALLEGATION: [18 U.S.C. §§ 2253(a)(2) and 2253(a)(3) – Criminal Forfeiture]

21 1. Upon conviction of one or more of the offenses alleged in Count One through Three of
22 this Indictment, defendant CHARLES BARRETT shall forfeit to the United States pursuant to 18 U.S.C.
23 §§ 2253(a)(2) and 2253(a)(3), any property, real or personal, constituting or traceable to gross profits or
24 other proceeds the defendant obtained as a result of said violations; and any property, real or personal,
25 used or intended to be used to commit or to promote the commission of such violations or any property
26 traceable to such property.

27 2. If any property subject to forfeiture as a result of the offenses alleged in Counts One
28 through Three of this Indictment, for which defendant is convicted:

1 a. cannot be located upon the exercise of due diligence;

2 b. has been transferred or sold to, or deposited with, a third party;

3 c. has been placed beyond the jurisdiction of the Court;

4 d. has been substantially diminished in value; or

5 e. has been commingled with other property which cannot be divided without

6 difficulty;

7 it is the intent of the United States, pursuant to 18 U.S.C. § 2253(b), incorporating 21 U.S.C. § 853(p),
8 to seek forfeiture of any other property of said defendant, up to the value of the property subject to
9 forfeiture.

10

11

12 A TRUE BILL.

13 */s/ Signature on file w/ KES*

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FOREPERSON

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17 PHILLP A. TALBERT
United States Attorney

18 **KIRK E. SHERIFF**

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KIRK E. SHERIFF
20 Assistant United States Attorney
21 Chief, Fresno Office