

UNITED STATES DISTRICT COURT
DISTRICT OF KANSAS
(WICHITA DOCKET)

UNITED STATES OF AMERICA	:	FILED UNDER SEAL
	:	
Plaintiff,	:	
	:	CRIMINAL NO. 16-10062-01-02-JTM
v.	:	
	:	VIOLATIONS:
	:	
OMAR CANTERO MARTINEZ	:	18 U.S.C. § 249 — Hate Crimes Act
ARMANDO SOTELO	:	
	:	
Defendants.	:	
_____	:	

SEALED INDICTMENT

THE GRAND JURY CHARGES:

INTRODUCTION

At all times material to this Indictment:

1. On or about June 19, 2015, defendants OMAR CANTERO MARTINEZ and ARMANDO SOTELO were residents of Dodge City, Kansas.
2. On or about June 19, 2015, M.H.D., A.M.A., and S.A.M. were Somali citizens who were lawfully present in the United States and residing in Dodge City, Kansas.

COUNT ONE
18 U.S.C. § 249(a)(1)
18 U.S.C. § 2

On or about June 19, 2015, in the State and District of Kansas, the defendants,

**OMAR CANTERO MARTINEZ and
ARMANDO SOTELO,**

aiding and abetting each other, did willfully cause bodily injury to M.H.D. because of M.H.D.'s actual and perceived race and national origin.

All in violation of Title 18, United States Code, Sections 249 and 2.

COUNT TWO
18 U.S.C. § 249(a)(1)
18 U.S.C. § 2

On or about June 19, 2015, in the State and District of Kansas, the defendants,

OMAR CANTERO MARTINEZ and
ARMANDO SOTELO,

aiding and abetting each other, did willfully cause bodily injury to A.M.A., and did attempt to cause bodily injury to A.M.A. using a dangerous weapon (specifically, a broken glass bottle), because of A.M.A.'s actual and perceived race and national origin.

All in violation of Title 18, United States Code, Sections 249 and 2.

COUNT THREE
18 U.S.C. § 249(a)(1)
18 U.S.C. § 2

On or about June 19, 2015, in the State and District of Kansas, the defendants,

OMAR CANTERO MARTINEZ and
ARMANDO SOTELO,

aiding and abetting each other, did willfully cause bodily injury to S.A.M., and did attempt to cause bodily injury to S.A.M. using a dangerous weapon (specifically, a broken glass bottle), because of S.A.M.'s actual and perceived race and national origin.

All in violation of Title 18, United States Code, Sections 249 and 2.

A TRUE BILL

April 26, 2016
DATE

s/Foreperson
FOREPERSON OF THE GRAND JURY

s/Thomas E. Beall

THOMAS E. BEALL

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District of Kansas

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[It is requested that jury trial be held in Wichita, Kansas.]