

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

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

NOV 05 2015

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
ERIC TRUJILLO,)
)
Defendant.)

MATTHEW J. DYKMAN

CRIMINAL NO. 15-3944 MCA ^{CLERK}

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

Counts 2-4: 18 U.S.C. §§ 2242(1) and 2246(2)(B): Aggravated Sexual Abuse;

Count 5: 18 U.S.C. §§ 2242(2)(B) and 2246(2)(C): Aggravated Sexual Abuse;

Counts 6-7: 18 U.S.C. §§ 2243(b) and 2246(2)(C): Sex Abuse of a Person in Official Detention.

INDICTMENT

The Grand Jury charges:

Count 1

On or about December 4, 2013, in Bernalillo County, in the District of New Mexico, in a facility in which persons are held in custody by direction of and pursuant to a contract with the Attorney General of the United States and an authorized representative of the United States Federal Bureau of Prisons, that being Dierson Charities Halfway House, the defendant, **ERIC TRUJILLO**, did knowingly engage in and attempt to engage in a sexual act with Jane Doe 1 by using force, and the sexual act consisted of the penetration, however slight, of Jane Doe 1's vulva by the defendant's hand and 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. §§ 2241(a)(1) and 2246(2)(C).

Count 2

On or between December 4, 2013 and March 17, 2014, in Bernalillo County, in the District of New Mexico, in a facility in which persons are held in custody by direction of and pursuant to a contract with the Attorney General of the United States and an authorized representative of the United States Federal Bureau of Prisons, that being Dierson Charities Halfway House, the defendant, **ERIC TRUJILLO**, did knowingly engage in and attempt to engage in a sexual act with Jane Doe 1, by threatening and placing Jane Doe 1 in fear, and the sexual act consisted of contact between the defendant's penis and Jane Doe 1's mouth.

In violation of 18 U.S.C. §§ 2242(1) and 2246(2)(B).

Count 3

On or between March 1, 2014, and March 17, 2014, in Bernalillo County, in the District of New Mexico, in a facility in which persons are held in custody by direction of and pursuant to a contract with the Attorney General of the United States and an authorized representative of the United States Federal Bureau of Prisons, that being Dierson Charities Halfway House, the defendant, **ERIC TRUJILLO**, did knowingly engage in and attempt to engage in a sexual act with Jane Doe 1, by threatening and placing Jane Doe 1 in fear, and the sexual act consisted of contact between the defendant's penis and Jane Doe 1's mouth.

In violation of 18 U.S.C. §§ 2242(1) and 2246(2)(B).

Count 4

On or between December 4, 2013 and March 17, 2014, in Bernalillo County, in the District of New Mexico, in a facility in which persons are held in custody by direction of and pursuant to a contract with the Attorney General of the United States and an authorized representative of the United States Federal Bureau of Prisons, that being Dierson Charities

Halfway House, the defendant, **ERIC TRUJILLO**, did knowingly engage in and attempt to engage in a sexual act with Jane Doe 1, by threatening and placing Jane Doe 1 in fear, and the sexual act consisted of contact between the defendant's mouth and Jane Doe 1's vulva.

In violation of 18 U.S.C. §§ 2242(1) and 2246(2)(B).

Count 5

On or about June 28, 2012, in Bernalillo County, in the District of New Mexico, in a facility in which persons are held in custody by direction of and pursuant to a contract with the Attorney General of the United States and an authorized representative of the United States Federal Bureau of Prisons, that being Dierson Charities Halfway House, the defendant, **ERIC TRUJILLO**, did knowingly engage in and attempt to engage in a sexual act with Jane Doe 2, who was at the time physically incapable of declining participation in, and physically incapable of communicating her unwillingness to engage in the sexual act, and the sexual act consisted of the penetration, however slight, of Jane Doe 2's vulva by the defendant's hand and 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. §§ 2242(2)(B) and 2246(2)(C).

Count 6

On or between August 31, 2012 and November 30, 2012, in Bernalillo County, in the District of New Mexico, in a facility in which persons are held in custody by direction of and pursuant to a contract with the Attorney General of the United States and an authorized representative of the United States Federal Bureau of Prisons, that being Dierson Charities Halfway House, the defendant, **ERIC TRUJILLO**, did knowingly engage in and attempt to engage in a sexual act with Jane Doe 3, who was in official detention, and was under defendant's

custodial, supervisory and disciplinary authority, and the sexual act consisted of the penetration, however slight, of Jane Doe 3's vulva by the defendant's hand and 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. §§ 2243(b) and 2246(2)(C).


Count 7

On or between November 1, 2012 and November 30, 2012, in Bernalillo County, in a facility in which persons are held in custody by direction of and pursuant to a contract with the Attorney General of the United States and an authorized representative of the United States Federal Bureau of Prisons, that being Dierson Charities Halfway House, the defendant, **ERIC TRUJILLO**, did knowingly engage in and attempt to engage in a sexual act with Jane Doe 4, who was in official detention, and was under defendant's custodial, supervisory and disciplinary authority, and the sexual act involved contact between the defendant's mouth and Jane Doe 4's vulva.

In violation of 18 U.S.C. §§ 2243(b) and 2246(2)(B).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY


Assistant United States Attorney

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