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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS CLERK

UNITED STATES OF AMERICA,	
Plaintiff,) CRIMINAL NO. <u>19-2328 MV</u>
VS.) Counts 1 and 2: 18 U.S.C. § 1201(a)(1):) Kidnapping.
TIMOTHY BACHICHA,)
Defendant.)

SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1

Beginning on or about October 30, 2018 and continuing until on or about October 31,

2018, in Bernalillo County, in the District of New Mexico, the defendant, TIMOTHY

BACHICHA, did unlawfully and willfully seize, confine, kidnap, abduct, carry away, and hold Jane Doe 1 for the purpose of committing a sexual assault, and, in committing and in furtherance of the commission of the offense, used a motor vehicle, a means, facility, and instrumentality of interstate commerce.

In violation of 18 U.S.C. § 1201(a)(1).

Count 2

Beginning on or about September 24, 2018 and continuing until on or about September 25, 2018, in Bernalillo County, in the District of New Mexico, the defendant, TIMOTHY BACHICHA, did unlawfully and willfully seize, confine, kidnap, abduct, carry away, and hold Jane Doe 2 for the purpose of committing a sexual assault, and, in committing and in furtherance

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of the commission of the offense, used a motor vehicle, a means, facility, and instrumentality of interstate commerce.

In violation of 18 U.S.C. § 1201(a)(1).

A TRUE BILL:

Assistant United States Attorney

/s/ FOREPERSON OF THE GRAND JURY