Case 1:22-cr-00886-DHU Document 15 Filed 05/25/22 Page 1 **FILED**

UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

MAY **2 5** 2022

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,)
Plaintiff,	CRIMINAL NO. 22.866 DANN
VS.) Count 1: 18 U.S.C. § 2422(b):) Attempted Coercion and Enticement;
JONATHAN JOHN JAMES) Attempted Coefeion and Entirement,
) Count 2: 18 U.S.C. §§ 2423(b) and (e):
Defendant.) Travel with Intent to Engage in Illicit
) Sexual Conduct.

INDICTMENT

The Grand Jury charges:

Count 1

From on or about April 20, 2022, through on or about May 5, 2022, in McKinley County, in the District of New Mexico, and elsewhere, the defendant, **JONATHAN JOHN JAMES**, using any facility and means of interstate and foreign commerce, did knowingly attempt to persuade, induce, entice and coerce an individual who had not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense.

In violation of 18 U.S.C. § 2422(b).

Count 2

On or about May 5, 2022, in McKinley County, in the District of New Mexico, and elsewhere, the defendant, **JONATHAN JOHN JAMES**, did travel in interstate commerce for the purpose of engaging in illicit sexual conduct, as defined in 18 U.S.C. § 2423(f)(1), with a person under 18 years of age, and attempted to do so.

In violation of 18 U.S.C. §§ 2423(b) and (e).

A TRUE BILL:

FOREPERSON OF THE GRAND JURY

Assistant United States Attorney