

FILEDUNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

AUG 27 2024

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,

Plaintiff,

vs.

KAYILIAB HAINES,

Defendant.

CRIMINAL NO. 24-1315 muCount 1: 18 U.S.C. §§ 1153 and
113(a)(8): Assault of an Intimate Partner
by Strangling;Count 2: 18 U.S.C. §§ 1153 and
113(a)(6): Assault Resulting in Serious
Bodily Injury;Count 3: 18 U.S.C. §§ 1153 and
1201(a)(2): Kidnapping.INDICTMENT

The Grand Jury charges:

Count 1

On or about April 7, 2024, and continuing to on or about April 8, 2024, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **KAYILIAB HAINES**, an Indian, assaulted Jane Doe, the defendant's spouse, intimate partner, and dating partner, by strangling, suffocating, and attempting to strangle and suffocate Jane Doe.

In violation of 18 U.S.C. §§ 1153 and 113(a)(8).

Count 2

On or about April 7, 2024, and continuing to on or about April 8, 2024, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **KAYILIAB HAINES**, an Indian, assaulted Jane Doe, and the assault resulted in serious bodily injury.

In violation of 18 U.S.C. §§ 1153 and 113(a)(6).

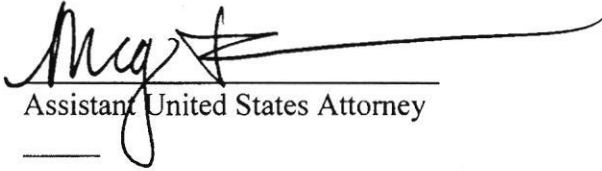
Count 3

From on or about April 7, 2024, and continuing to on or about April 8, 2024, in Indian Country, in Rio Arriba County, in the District of New Mexico, the defendant, **KAYILIAB HAINES**, an Indian, unlawfully kidnapped, abducted, seized, and confined Jane Doe and held her for ransom, reward, and otherwise.

In violation of 18 U.S.C. §§ 1153 and 1201(a)(2).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY


Assistant United States Attorney