

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

DEC 03 2024

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PATRICK WAYNE PLATERO,

Defendant.

MITCHELL R. ELFERS

CLERK

CRIMINAL NO.

24-1720 MLG

Count 1: 18 U.S.C. §§ 1153, 2242(3), and
2246(2)(C): Sexual Abuse,

Count 2: 18 U.S.C. §§ 1153, 2244(a)(2),
and 2246(3): Abusive Sexual Contact.

INDICTMENT

The Grand Jury charges:

Count 1

Between on or about January 1, 2024, and on or about April 30, 2024, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **PATRICK WAYNE PLATERO**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe, without Jane Doe's consent, to include doing so through coercion, and the sexual act consisted of penetration, however slight, of the genital opening of Jane Doe by a hand and finger of the defendant and by any object, with the intent to abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2242(3), and 2246(2)(C).

Count 2

Between on or about January 1, 2024, and on or about April 30, 2024, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **PATRICK WAYNE PLATERO**, an Indian, unlawfully and knowingly engaged in and caused sexual contact with Jane Doe, without Jane Doe's consent, to include doing so through coercion, and the sexual

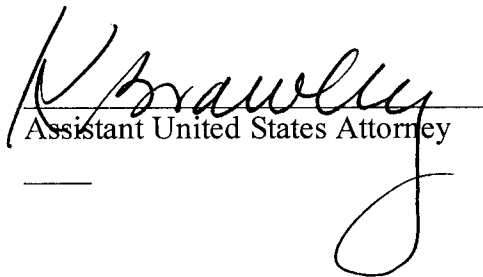
contact consisted of the defendant intentionally touching, directly and through the clothing, Jane Doe's breast, with the intent to abuse, humiliate, harass, degrade, arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2244(a)(2), and 2246(3).

A TRUE BILL:

151

FOREPERSON OF THE GRAND JURY


Assistant United States Attorney