FILED

UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

AUG 2 7 2024

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS

UNITED STATES OF AMERICA,)
Plaintiff,) CRIMINAL NO. 24-1311 JB
vs.) Count 1: 18 U.S.C. §§ 1153, 2241(c), and
) 2246(2)(B): Aggravated Sexual Abuse;
JEREMY BLUEEYES,)
) Count 2: 18 U.S.C. §§ 1153, 2241(c), and
Defendant.) 2246(2)(D): Aggravated Sexual Abuse.

INDICTMENT

The Grand Jury charges:

Count 1

Between on or about January 1, 2019, and on or about December 31, 2019, in Indian Country, in San Juan County in the District of New Mexico, the defendant, **JEREMY BLUEEYES**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe, a child who had not then attained the age of 12 years, and the sexual act consisted of contact between the mouth and the vulva.

In violation of 18 U.S.C. §§ 1153, 2241(c), and 2246(2)(B).

Count 2

Between on or about January 1, 2019, and on or about December 31, 2019, in Indian Country, in San Juan County in the District of New Mexico, the defendant, **JEREMY BLUEEYES**, an Indian, unlawfully and knowingly engaged in and attempted to engage in a sexual act with Jane Doe, a child who had not then attained the age of 12 years, and the sexual act consisted of the intentional touching, not through the clothing, of the genitalia of Jane Doe with

the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

In violation of 18 U.S.C. §§ 1153, 2241(c), and 2246(2)(D).

A TRUE BILL:

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Assistant United States Attorney