## FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

STAT. ANN. § 30-6-1(D): Abandonment and Abuse of a Child, Recklessly Caused.

IN THE UNITED	STATES DISTRICT COULT APR - 8 2025
FOR THE DIST	TRICT OF NEW MEXICO MITCHELL R. ELFERS
UNITED STATES OF AMERICA,	) CLERK
Plaintiff,	) CRIMINAL NO. <u>25-716 KWR</u> )
vs.	) Count 1: 18 U.S.C. §§ 1153 and 113(a)(6):
RAESHAWN DOCTOR and HARLEY NELSON,	<ul><li>Assault Resulting in Serious Bodily</li><li>Injury;</li></ul>
	) Count 2: 18 U.S.C. § 1153 and N.M.

## INDICTMENT

The Grand Jury charges:

Defendants.

## Count 1

On or about September 9, 2024, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **RAESHAWN DOCTOR**, 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 2

From on or about September 9, 2024, and continuing to on or about January 31, 2025, in Indian Country, in San Juan County, in the District of New Mexico, the defendants,

RAESHAWN DOCTOR and HARLEY NELSON, Indians, and parents, guardians and custodians of Jane Doe, a minor under the age of 18, knowingly, recklessly, and without justifiable cause, permitted Jane Doe to suffer from medical neglect and recklessly permitted Jane Doe to be placed in a situation that may have endangered the life and health of Jane Doe.

In violation of 18 U.S.C. § 1153(b) and N.M. STAT. ANN. § 30-6-1(D).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

Assistant United States Attorney