# FILED

UNITED STATES DISTRICT COURT ALBUQUERQUE, NEW MEXICO

MAY 1 3 2025

# IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS CLERK

UNITED STATES OF AMERICA,	)
Plaintiff,	) CRIMINAL NO. 28-1334 DHW
vs.	) Count 1: 18 U.S.C. §§ 1153 and
	) 113(a)(6): Assault Resulting in Serious
BEVERLETA TAYAH,	) Bodily Injury;
	)
Defendant.	) Count 2: 18 U.S.C. §§ 1153 and
	) 113(a)(3): Assault with a Dangerous
	) Weapon;
	)
	) Count 3: 18 U.S.C. § 924(c)(1)(A)(iii):
	) Using and Carrying a Firearm During and
	) in Relation to a Crime of Violence, and
	) Possessing a Firearm in Furtherance of
	) Such Crime; Discharging Said Firearm.

# **INDICTMENT**

The Grand Jury charges:

#### Count 1

On or about November 17, 2024, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **BEVERLETA TAYAH**, an Indian, assaulted John Doe, and the assault resulted in serious bodily injury.

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

# Count 2

On or about November 17, 2024, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **BEVERLETA TAYAH**, an Indian, assaulted John Doe with a dangerous weapon, specifically, a handgun, with intent to do bodily harm.

In violation of 18 U.S.C. §§ 1153 and 113(a)(3).

# Count 3

On or about November 17, 2024, in McKinley County, in the District of New Mexico, the defendant, **BEVERLETA TAYAH**, knowingly used and carried a firearm, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, assault with a dangerous weapon as charged in Count 2 of this indictment, and possessed said firearm in furtherance of such crime, and the firearm was discharged.

In violation of 18 U.S.C. § 924(c)(1)(A)(iii).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

Assistant United States Attorney