

IN THE UNITED STATES DISTRICT COURT

UNITED STATES OF AMERICA,

Plaintiff,

VS.

SHELIKY SANCHEZ,

Defendant.

CRIMINAL NO. 25-3574 KWR

Count 1: 18 U.S.C. § 2119(3): Carjacking
Resulting in Death;

Count 2: 18 U.S.C. §§ 924(c)(1)(A)(iii) and (j)(1): 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; and Causing Death Through Use and Possession of a Firearm;

Count 3: 18 U.S.C. § 1201(a)(1):
Kidnapping Resulting in Death.

INDICTMENT

The Grand Jury charges:

Count 1

On or about August 7, 2025, in Bernalillo County, in the District of New Mexico, the defendant, **SHELIKY SANCHEZ**, with the intent to cause death and serious bodily harm, took a motor vehicle, that is, a 2022 Ford Escape, that had been transported, shipped and received in interstate and foreign commerce, from the person and presence of John Doe, by force and violence, and by intimidation, resulting in the death of John Doe.

In violation of 18 U.S.C. § 2119(3).

Count 2

On or about August 7, 2025, in Bernalillo County, in the District of New Mexico, the defendant, **SHELIKY SANCHEZ**, 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, carjacking resulting in death as charged in Count 1 of this indictment, and possessed said firearm in furtherance of such crime, and the firearm was discharged, and in the course of said offense caused the death of John Doe through the use of the firearm, and the killing constituted murder as defined in 18 U.S.C. § 1111.

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

Count 3

On or about August 7, 2025, in Bernalillo County, in the District of New Mexico, the defendant, **SHELIKY SANCHEZ**, unlawfully and willfully seized, confined, kidnapped, abducted, inveigled, carried away, and held for some purpose and benefit John Doe, and, in committing and in furtherance of the commission of the offense, used a 2022 Ford Escape which was then being used as a commercial common carrier engaged in interstate commerce, a cellular telephone, the internet, and a firearm, means, facilities, and instrumentalities of interstate and foreign commerce, and, as to John Doe, death resulted.

In violation of 18 U.S.C. § 1201(a)(1).

FORFEITURE ALLEGATION

Upon conviction of any offense in violation of 18 U.S.C. §§ 922(g), 922(j), 924(c), 1201(a)(1), and 2119(3), the defendant, **SHELIKY SANCHEZ** shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms involved in the

commission of the offense, including, but not limited to, a .40 Hi-Point JCP model pistol, serial number X7290821.

NOTICE OF SPECIAL FINDINGS

The Grand Jury repeats and realleges the accusations in Counts 1, 2, and 3 of the Indictment.

With respect to Counts 1, 2, and 3, the Grand Jury makes the following special findings that the defendant, **SHELIKY SANCHEZ**:

- a. was 18 years of age or older at the time of the offenses charged in Counts 1, 2, and 3 (18 U.S.C. § 3591(a));
- b. intentionally killed John Doe (18 U.S.C. § 3591(a)(2)(A));
- c. intentionally inflicted serious bodily injury that resulted in the death of John Doe (18 U.S.C. § 3591(a)(2)(B));
- d. intentionally participated in an act, contemplating that the life of a person would be taken or intending that lethal force would be used in connection with a person, other than one of the participants in the offense, and that John Doe died as a direct result of the act (18 U.S.C. § 3591(a)(2)(C));
- e. intentionally and specifically engaged in an act of violence, knowing that the act created a grave risk of death to a person, other than one of the participants in the offense, such that participation in the act constituted a reckless disregard for human life and John Doe died as a direct result of the act (18 U.S.C. § 3591(a)(2)(D));
- f. caused death, and injury resulting in death, during the commission, attempted commission, and immediate flight from the commission of an offense under 18 U.S.C. § 1201 (18 U.S.C. § 3592(c)(1)); and

g. committed the offense as consideration for the receipt, or in the expectation of the receipt, of anything of pecuniary value (18 U.S.C. § 3592(c)(8)).

A TRUE BILL

IS
FOREPERSON OF THE GRAND JURY


Assistant United States Attorney