

FILED
At Albuquerque NM

MAY 13 2016 *wd*

MATTHEW J. DYKMAN
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,)
Plaintiff,)
)
v.)
)
GILL PARKER PAYNE,)
Defendant.)

CRIMINAL NO: 16-2074 SCY

VIOLATION: 18 U.S.C. § 247(a)(2)
(obstructing exercise of religious beliefs)

INFORMATION

The United States charges:

On or about December 11, 2015, in the District of New Mexico, the defendant, **GILL PARKER PAYNE**, did intentionally obstruct and attempt to obstruct, by force or threat of force, K.A., a Muslim woman, in the enjoyment of K.A.'s free exercise of religious beliefs, when defendant **GILL PARKER PAYNE** forcibly removed K.A.'s hijab. This offense was in and affected interstate commerce because it occurred while in-flight on an airplane.

In violation of Title 18, United States Code, Section 247(a)(2).

Dated this 13th day of May, 2016.

Respectfully submitted,

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