

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

APR 25 2024

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
VERNON CHAVEZ,)
)
Defendant.)

CRIMINAL NO. 24CR547-MLG
Count 1: 18 U.S.C. §§ 1153, 2241(c), and
2246(2)(D): Aggravated Sexual Abuse;
Count 2: 18 U.S.C. §§ 1153, 2244(a)(5),
and 2246(3): Abusive Sexual Contact.

INDICTMENT

The Grand Jury charges:

Count 1

Between on or about May 1, 2016, and on or about September 1, 2017, in Indian Country, in Sandoval County, in the District of New Mexico, the defendant, **VERNON CHAVEZ**, 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 another with an 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).

Count 2

Between on or about August 1, 2022, and on or about August 15, 2022, in Indian Country, in Sandoval County, in the District of New Mexico, the defendant, **VERNON CHAVEZ**, an Indian, unlawfully and knowingly engaged in and caused sexual contact with Jane Doe, a child who had not then attained the age of 12 years, and the sexual contact consisted of the

defendant intentionally touching Jane Doe's buttocks, directly and through the clothing, 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, 2244(a)(5), and 2246(3).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY


Assistant United States Attorney

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