

and knowingly engaged in and caused sexual contact with and by Jane Doe, a child who had attained the age of 12 years but not the age of 16 years, and the sexual contact consisted of the intentional touching, directly and through the clothing, of the breast of any person 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, 2244(a)(5) and 2246(3).

Count 3

Between on or about February 26, 2016 and on or about February 27, 2016, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **DONOVAN PETE**, an Indian who is at least four years older than Jane Doe, knowingly engaged in and caused sexual contact with and by Jane Doe, a child who had attained the age of 12 years but not the age of 16 years, and the sexual contact consisted of the intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, and buttocks of any person, 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, 2244(a)(5), and 2246(3).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

Jayla Martin
Assistant United States Attorney