

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

SEP 24 2024

MITCHELL R. ELFERS
CLERK

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

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.)
)
AVEDALE JOHNSON,)
)
Defendant.)

CRIMINAL NO. **24-1351MLC**
Counts 1-3: 18 U.S.C. § 1153 and N.M.
STAT. ANN. § 30-6-1(D): Abandonment
or Abuse of a Child (Recklessly Caused)
(No Death or Great Bodily Harm).

INDICTMENT

The Grand Jury charges:

Count 1

On or about May 4, 2024, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **AVEDALE JOHNSON**, an Indian, and parent, guardian and custodian of Jane Doe 1, a minor under the age of 18, knowingly, recklessly, and without justifiable cause, operated a motor vehicle while under the influence of alcohol, causing Jane Doe 1 to be placed in a situation that may have endangered the life and health of Jane Doe 1.

In violation of 18 U.S.C. § 1153 and N.M. STAT. ANN. § 30-6-1(D).

Count 2

On or about May 4, 2024, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **AVEDALE JOHNSON**, an Indian, and parent, guardian and custodian of Jane Doe 2, a minor under the age of 18, knowingly, recklessly, and without justifiable cause, operated a motor vehicle while under the influence of alcohol, causing Jane Doe 2 to be placed in a situation that may have endangered the life and health of Jane Doe 2.

In violation of 18 U.S.C. § 1153 and N.M. STAT. ANN. § 30-6-1(D).

Count 3

On or about May 4, 2024, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **AVEDALE JOHNSON**, an Indian, and parent, guardian and custodian of Jane Doe 3, a minor under the age of 18, knowingly, recklessly, and without justifiable cause, operated a motor vehicle while under the influence of alcohol, causing Jane Doe 3 to be placed in a situation that may have endangered the life and health of Jane Doe 3.

In violation of 18 U.S.C. § 1153 and N.M. STAT. ANN. § 30-6-1(D).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

[Handwritten Signature]

Assistant United States Attorney