

APR 11 2023

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

MITCHELL R. ELFERS
CLERK

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	CRIMINAL NO. <u>Cp 23-470 JB</u>
)	
vs.)	Count 1: 18 U.S.C. §§ 1153 and 1112:
)	Involuntary Manslaughter;
COURTNEY FRANK,)	
)	Count 2: 18 U.S.C. §§ 1153 and
Defendant.)	113(a)(6): Assault Resulting in Serious
)	Bodily Injury.

INDICTMENT

The Grand Jury charges:

Count 1

On or about September 28, 2022, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **COURTNEY FRANK**, an Indian, unlawfully killed Jane Doe 1 by operating a motor vehicle without due caution and circumspection and with a wanton and reckless disregard for human life when she knew and should have known that her conduct imperiled the lives of others.

In violation of 18 U.S.C. §§ 1153 and 1112.

Count 2

On or about September 28, 2022, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **COURTNEY FRANK**, an Indian, assaulted John Doe 1, and the assault resulted in serious bodily injury.

In violation of 18 U.S.C. §§ 1153 and 113(a)(6).

A TRUE BILL:

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FOREPERSON OF THE GRAND JURY

Joyce M. ...
Assistant United States Attorney

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