UNITED STATES DISTRICT COURT DISTRICT OF SOUTH DAKOTA WESTERN DIVISION



UNITED STATES OF AMERICA,

Plaintiff,

**INDICTMENT** 

CR

vs.

Involuntary Manslaughter (18 U.S.C. §§ 1153 and 1112)

14-50077

SARAH LILLY BROWN EYES,

Defendant.

The Grand Jury charges:

On or about June 24, 2014, at Slim Buttes, in Indian country, in the District of South Dakota, Sarah Lilly Brown Eyes, an Indian, did unlawfully kill Thomas Norman Brown Eyes, without malice, in the commission of a lawful act in an unlawful manner and without due caution and circumspection which might produce death. Such act was committed in a grossly negligent manner with actual knowledge that her conduct was a threat to the lives of others and with actual knowledge that would reasonably enable her to foresee the peril to which her act might subject another, to wit, driving a motor vehicle while under the influence of alcohol, all in violation of 18 U.S.C. §§ 1153 and 1112.

A TRUE BILL:

## NAME REDACTED

BRENDAN V. JOHNSON United States Attorney By:

Foreperson