

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
WESTERN DIVISION

**FILED**  
**MAY 19 2015**  
*[Signature]*  
CLERK

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UNITED STATES OF AMERICA,

CR 15-50061

Plaintiff,

REDACTED INDICTMENT

vs.

Abusive Sexual Contact  
(18 U.S.C. §§ 1152, 2244(a)(5), and  
2246(3))

FRANK GALLARDO,

Defendant.

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The Grand Jury charges:

Count I

On or about March 12, 2015, near Porcupine, in Indian country, in the District of South Dakota, the defendant, Frank Gallardo, did knowingly engage in and attempt to engage in sexual contact and cause sexual contact with [Name Redacted], an Indian child who had not attained the age of twelve years, that is, the intentional touching, through the clothing, of the genitalia, groin, inner thigh, and buttocks of [Name Redacted], all in violation of 18 U.S.C. §§ 1152, 2244(a)(5), and 2246(3).

Count II

On or about March 14, 2015, near Porcupine, in Indian country, in the District of South Dakota, the defendant, Frank Gallardo, did knowingly engage in and attempt to engage in a sexual contact and cause sexual contact with [Name Redacted], an Indian child who had not attained the age of twelve years,

that is, the intentional touching, through the clothing, of the genitalia groin, inner thigh, and buttocks of [Name Redacted], all in violation of 18 U.S.C. §§ 1152, 2244(a)(5), and 2246(3).

A TRUE BILL:

**NAME REDACTED**

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Foreperson

RANDOLPH J. SEILER  
Acting United States Attorney

By: 