


UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH DAKOTA  
NORTHERN DIVISION

**FILED**  
JUL 14 2015  
  
CLERK

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UNITED STATES OF AMERICA,

CR *15-10030-01*

Plaintiff,

REDACTED INDICTMENT

v.

CHILD ABUSE

VELNITA JOLETTE HAIRY CHIN,

18 U.S.C. § 1153, and  
SDCL 26-10-1

Defendant.

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The Grand Jury charges:

COUNT I

On or about the 23rd day of June, 2015, at Bullhead, in Corson County, in Indian country, in the District of South Dakota, Velnita Jolette Hairy Chin, an Indian, did abuse, expose, torture, torment, and cruelly punish [Name Redacted], a child who had not yet attained the age of seven years, in violation of 18 U.S.C. § 1153, and SDCL 26-10-1.

COUNT II

On or about the 23rd day of June, 2015, at Bullhead, in Corson County, in Indian country, in the District of South Dakota, Velnita Jolette Hairy Chin, an Indian, did abuse, expose, torture, torment, and cruelly punish [Name Redacted], a child who had not yet attained the age of seven years, in violation of 18 U.S.C. § 1153, and SDCL 26-10-1.

COUNT III

On or about the 23rd day of June, 2015, at Bullhead, in Corson County, in Indian country, in the District of South Dakota, Velnita Jolette Hairy Chin, an Indian, did abuse, expose, torture, torment, and cruelly punish [Name Redacted], a child who had not yet attained the age of seven years, in violation of 18 U.S.C. § 1153, and SDCL 26-10-1.

COUNT IV

On or about the 23rd day of June, 2015, at Bullhead, in Corson County, in Indian country, in the District of South Dakota, Velnita Jolette Hairy Chin, an Indian, did abuse, expose, torture, torment, and cruelly punish [Name Redacted], a child who had not yet attained the age of seven years, in violation of 18 U.S.C. § 1153, and SDCL 26-10-1.

COUNT V

On or about the 23rd day of June, 2015, at Bullhead, in Corson County, in Indian country, in the District of South Dakota, Velnita Jolette Hairy Chin, an Indian, did abuse, expose, torture, torment, and cruelly punish [Name Redacted], a child who had not yet attained the age of seven years, in violation of 18 U.S.C. § 1153, and SDCL 26-10-1.

COUNT VI

On or about the 23rd day of June, 2015, at Bullhead, in Corson County, in Indian country, in the District of South Dakota, Velnita Jolette Hairy Chin, an Indian, did abuse, expose, torture, torment, and cruelly punish [Name

Redacted], a child who had not yet attained the age of seven years, in violation of 18 U.S.C. § 1153, and SDCL 26-10-1.

COUNT VII

On or about the 23rd day of June, 2015, at Bullhead, in Corson County, in Indian country, in the District of South Dakota, Velnita Jolette Hairy Chin, an Indian, did abuse, expose, torture, torment, and cruelly punish [Name Redacted], a child who had not yet attained the age of seven years, in violation of 18 U.S.C. § 1153, and SDCL 26-10-1.

A TRUE BILL:

**NAME REDACTED**

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Foreperson

RANDOLPH J. SEILER  
Acting United States Attorney

By 