

FILED

SEP 12 2016

Clerk, U.S. District Court
District Of Montana
Great Falls

BRYAN T. DAKE
Assistant U.S. Attorney
U.S. Attorney's Office
P.O. Box 3447
Great Falls, MT 59403
119 First Ave. N., Suite 300
Great Falls, MT 59403
Phone: (406) 761-7715
Fax: (406) 453-9973
E-mail: Bryan.Dake@usdoj.gov

**ATTORNEY FOR PLAINTIFF
UNITED STATES OF AMERICA**

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION**

<p>UNITED STATES OF AMERICA,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">vs.</p> <p>JANELLE RED DOG,</p> <p style="text-align: center;">Defendant.</p>	<p>CR 16- 60 -GF-BMM</p> <p>INDICTMENT</p> <p>FIRST DEGREE MURDER – FELONY MURDER RULE (Count I) Title 18 U.S.C. §§ 1153(a) and 1111(a) (Penalty: Mandatory life imprisonment, and \$250,000 fine)</p> <p>SECOND DEGREE MURDER (Count II) Title 18 U.S.C. §§ 1153(a), 1111(a), 3559(f)(1) (Penalty: Mandatory life imprisonment and \$250,000 fine)</p> <p>FELONY CHILD ABUSE (Count III) Title 18 U.S.C. §§ 1153(a) and Mont. Code Ann. § 45-5-212(1).</p>
--	--

	<p>(Penalty: Five years imprisonment, \$50,000 fine, and three years supervised release)</p> <p>ACCESSORY AFTER THE FACT (Count IV) Title 18 U.S.C. § 3 (Penalty: Fifteen years imprisonment, \$125,000 fine, three years supervised release)</p>
--	---

THE GRAND JURY CHARGES:

COUNT I

That on or about April 19, 2016, at Poplar, in the State and District of Montana, and within the exterior boundaries of the Fort Peck Indian Reservation, being Indian Country, the defendant, JANELLE RED DOG, an Indian person, unlawfully killed K.O. in the perpetration of the crime of felony child abuse as alleged in Count III, all in violation of 18 U.S.C. §§ 1153(a) and 1111(a).

COUNT II

That on or about April 19, 2016, at Poplar, in the State and District of Montana, and within the exterior boundaries of the Fort Peck Indian Reservation, being Indian Country, the defendant, JANELLE RED DOG, an Indian person, knowingly and unlawfully killed K.O. with malice aforethought, constituting a crime of violence and circumstances satisfying subparagraphs (A) and (B) of 18 U.S.C. § 3591(a)(2), in violation of 18 U.S.C. §§ 1153(a), 1111(a), and 3559(f)(1).

COUNT III

That on or about April 19, 2016, at Poplar, in the State and District of Montana, and within the exterior boundaries of the Fort Peck Indian Reservation, being Indian Country, the defendant, JANELLE RED DOG, an Indian person, who is over the age of eighteen (18) years, purposely and knowingly caused bodily injury to a minor, K.O, an individual who had not attained the age of fourteen (14) years, in violation of 18 U.S.C. § 1153(a) and Mont. Code Ann. § 45-5-212(1).

COUNT IV

That on or about April 19, 2016, at Poplar in the State and District of Montana, and within the exterior boundaries of the Fort Peck Indian Reservation, being Indian Country, the defendant, JANELLE RED DOG, knowing that certain offenses against the United States have been committed, to wit, aggravated sexual abuse in violation of 18 U.S.C. § 2241(c), did receive, relieve, comfort, and assist the offender, JOHN DOE, in order to hinder and prevent the offender's apprehension, in violation of 18 U.S.C. § 3.

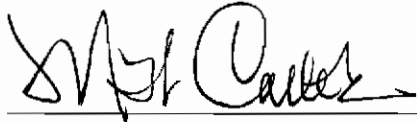
///

///

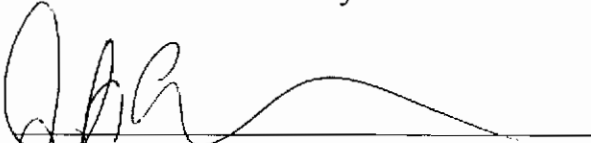
///

A TRUE BILL.

Foreperson signature redacted. Original document filed under seal.



MICHAEL W. COTTER
United States Attorney



JOSEPH E. THAGGARD
Criminal Chief Assistant U.S. Attorney

Crim. Summons _____

Warrants _____

Bills _____