

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

FILED
CHARLOTTE, NC
JUL 19 2016
US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA) DOCKET NO. 1: 16 CR 85
)
v.) **BILL OF INDICTMENT**
)
) Violation: 18 U.S.C. § 1204
)
SHIRA ELIZABETH MATTOCKS,)
a/k/a/ SHIRA ELIZABETH RAMAN)
_____)

THE GRAND JURY CHARGES:

COUNT ONE

On or about November 14, 2014, in Swain County, within the Western District of North Carolina, and elsewhere, the defendant

**SHIRA ELIZABETH MATTOCKS,
a/k/a/ SHIRA ELIZABETH RAMAN**

did knowingly remove from the United States a child, J.O., and did knowingly retain said child who had been in the United States outside the United States, with the intent to obstruct the lawful exercise of parental rights by the father of said child.

All in violation of Title 18, United States Code, Section 1204.

COUNT TWO

On or about November 14, 2014, in Swain County, within the Western District of North Carolina, and elsewhere, the defendant

**SHIRA ELIZABETH MATTOCKS,
a/k/a/ SHIRA ELIZABETH RAMAN**

did knowingly remove from the United States a child, S.O., and did knowingly retain said child who had been in the United States outside the United States, with the intent to obstruct the lawful exercise of parental rights by the father of said child.

All in violation of Title 18, United States Code, Section 1204.

COUNT THREE

On or about November 14, 2014, in Swain County, within the Western District of North Carolina, and elsewhere, the defendant

**SHIRA ELIZABETH MATTOCKS,
a/k/a/ SHIRA ELIZABETH RAMAN**

did knowingly remove from the United States a child, E.A., and did knowingly retain said child who had been in the United States outside the United States, with the intent to obstruct the lawful exercise of parental rights by the father of said child.

All in violation of Title 18, United States Code, Section 1204.

A TRUE BILL:

GRAND JURY FOREPERSON

JILL WESTMORELAND ROSE
UNITED STATES ATTORNEY



JOHN D. PRITCHARD
ASSISTANT UNITED STATES ATTORNEY