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DISTRICT COURT
DONA ANA COUNTY, NM
COUNTY CLERK

STATE OF NEW MEXICO
COUNTY OF DONA ANA
THIRD JUDICIAL DISTRICT

STATE OF NEW MEXICO,

Plaintiff,

vs.

SHAWN BOHANNON,

Defendant.

No. CR-2005 683

Judge:
THIS CASE HAS BEEN ASSIGNED TO
~~XXXXXXXXXX~~

**CHARGES: Criminal Sexual Penetration in the Fourth Degree (School Employee)(19 counts)
and Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee)(10 counts)**

GRAND JURY INDICTMENT

John Robbins
John Cano-Garcia

THE GRAND JURY CHARGES:

Count 1: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between September 1, 2002 and September 30, 2002, in Dona Ana County, New Mexico, the above-named defendant did cause ~~XXXXXXXXXX~~ to engage in sexual intercourse, and ~~XXXXXXXXXX~~ was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that ~~XXXXXXXXXX~~ was a student in the school and the defendant was at least eighteen years of age and at least four years older than ~~XXXXXXXXXX~~, a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 2: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between September 1, 2002 and October 31, 2002, in Dona Ana County, New Mexico, the above-named defendant did cause ~~XXXXXXXXXX~~ to engage in sexual intercourse, and ~~XXXXXXXXXX~~ was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that ~~XXXXXXXXXX~~ was a student in the school and the defendant was at least eighteen years of age and at least four years older than ~~XXXXXXXXXX~~, a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 3: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between October 1, 2002 and October 31, 2002, in Dona Ana County, New Mexico, the above-named defendant did cause ~~XXXXXXXXXX~~ to engage in sexual intercourse, and ~~XXXXXXXXXX~~ was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that ~~XXXXXXXXXX~~ was a student in the school and the defendant was at least eighteen years of age and at least

four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 4: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between November 1, 2002 and November 30, 2002, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 5: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between December 1, 2002 and December 31, 2002, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 6: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between January 1, 2003 and January 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 7: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between February 1, 2003 and February 28, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 8: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between March 1, 2003 and March 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a

less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 9: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between April 1, 2003 and April 30, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 10: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between May 1, 2003 and May 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 11: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between June 1, 2003 and June 30, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 12: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between July 1, 2003 and July 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 13: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between August 1, 2003 and August 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least

four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 14: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between September 1, 2003 and September 30, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 15: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between October 1, 2003 and October 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 16: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between November 1, 2003 and November 30, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 17: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between December 1, 2003 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in sexual intercourse, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 18: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in cunnilingus, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was

a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 19: Criminal Sexual Penetration in the Fourth Degree (School Employee), on or between September 1, 2002 and December 13, 2003, in Dona Ana County, New Mexico, the above-named defendant did cause [REDACTED] to engage in cunnilingus, and [REDACTED] was at least thirteen but less than eighteen years of age and was not the spouse of the defendant, and the defendant was a person who was a licensed school employee, and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-11(A)&(F), NMSA 1978.

Count 20: Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee), on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED], and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 21: Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee), on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED], and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 22: Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee), on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED], and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 23: **Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee)**, on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED] and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 24: **Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee)**, on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED] and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 25: **Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee)**, on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED] and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 26: **Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee)**, on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED] and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 27: **Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee)**, on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-

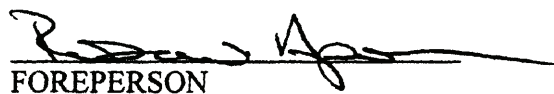
named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED] and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 28: Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee), on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED] and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

Count 29: Criminal Sexual Contact of a Minor in the Fourth Degree (School Employee), on or between September 1, 2002 and December 31, 2003, in Dona Ana County, New Mexico, the above-named defendant did touch or apply force to the intimate parts of [REDACTED], who was at least thirteen but less than eighteen years of age, to wit: touched the breast and buttocks of [REDACTED] and the defendant was a person who was a licensed school employee, an unlicensed school employee, a school contract employee, a school health service provider or a school volunteer and the defendant learned that [REDACTED] was a student in the school and the defendant was at least eighteen years of age and at least four years older than [REDACTED], a fourth degree felony, contrary to §30-9-13(B), NMSA 1978.

The name of the witness upon whose testimony this Indictment is based is Investigator Robyn Gojkovich.

I hereby certify that the foregoing instrument is a True Bill.


FOREPERSON

DATE: 5-19-05