IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLORADO

Criminal Case No. 17-cr-00384-CMA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIC RONALD BOLDUAN,

Defendant.

INDICTMENT

Count One: 18 U.S.C. § 2261A(2)(B) Stalking
Count Two: 18 U.S.C. § 2261A(2)(B) Stalking
Count Three: 18 U.S. C. § 875(c) Interstate Communications
Count Four: 18 U.S.C. § 2261A(2)(B) Stalking
Count Five: 18 U.S. C. § 875(c) Interstate Communications

Count Six: 18 U.S. C. § 875(c) Interstate Communications

The Grand Jury charges:

COUNT ONE

Between and including November 28, 2015, and December 9, 2015, in the State and District of Colorado and elsewhere, ERIC RONALD BOLDUAN, defendant herein, with the intent to harass or intimidate another person, N.D., used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that caused substantial distress to N.D, attempted to cause substantial emotional distress

to N.D. and would be reasonably expected to cause substantial emotional distress to N.D..

All in violation of Title 18, United States Code, Section 2261A(2)(A) and (B).

COUNT TWO

Between and including November 28, 2015, and November 14, 2016, in the State and District of Colorado and elsewhere, ERIC RONALD BOLDUAN, defendant herein, with the intent to harass or intimidate another person, J.D., used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that caused substantial distress to J.D. attempted to cause substantial emotional distress to J.D. and would be reasonably expected to cause substantial emotional distress to J.D.

All in violation of Title 18, United States Code, Section 2261A(2)(A) and (B).

COUNT THREE

Between and including April 14, 2016, and April 28, 2016, in the State and District of Colorado and elsewhere, ERIC RONALD BOLDUAN did knowingly transmit communications containing threats to injure the person of another, specifically J.D., and the communication was sent in interstate commerce. The defendant transmitted the communication for the purpose of issuing a threat.

All in violation of Title 18, United States Code, Section 875(c).

COUNT FOUR

Between and including April 16, 2016, and October 13, 2016, in the State and District of

Colorado and elsewhere, ERIC RONALD BOLDUAN, defendant herein, with the intent to harass or intimidate another person, K.K., used the mail, any interactive computer service or electronic communication service or electronic communication system of interstate commerce, or any other facility of interstate or foreign commerce to engage in a course of conduct that caused substantial distress to K.K., attempted to cause substantial emotional distress to J.D. and would be reasonably expected to cause substantial emotional distress to K.K.

All in violation of Title 18, United States Code, Section 2261A(2)(A) and (B).

COUNT FIVE

Between and including September 6, 2016, and October 11, 2016, in the State and District of Colorado and elsewhere, ERIC RONALD BOLDUAN did knowingly transmit communications containing threats to injure the person of another, specifically K.K., and the communication was sent in interstate commerce. The defendant transmitted the communication for the purpose of issuing a threat.

All in violation of Title 18, United States Code, Section 875(c).

COUNT SIX

Between and including October 13, 2016, and October 17, 2016, in the State and District of Colorado and elsewhere, ERIC RONALD BOLDUAN did knowingly transmit communications containing threats to injure the person of another, specifically T.T., and the communication was sent in interstate commerce. The defendant transmitted the communication for the purpose of issuing a threat.

All in violation of Title 18, United States Code, Section 875(c).

A TRUE BILL:

<u>Ink signature on file in the clerk's office</u> FOREPERSON

ROBERT C. TROYER
Acting United States Attorney

By: s/Valeria N. Spencer Valeria N. Spencer Assistant U.S. Attorney U.S. Attorney's Office 1801 California, Ste. 700 Denver, CO 80202

Telephone: 303-454-0100

Fax: 303-454-0401

E-mail: Valeria.Spencer@usdoj.gov

ATTORNEY FOR THE UNITED STATES OF AMERICA