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**UNITED STATES DISTRICT COURT**  
**District of Kansas**

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**UNITED STATES OF AMERICA,**

**Plaintiff,**

**v.**

**CASE NO. 6:23-cr-10096-JWB**

**RICHARD EMIL CHRISTENSEN,**

**Defendant.**

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**INDICTMENT**

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**THE GRAND JURY CHARGES:**

**COUNT 1**

**AGGRAVATED SEXUAL ABUSE – OF A MINOR**  
**[18 U.S.C. § 2241(c)]**

Between October 21, 2014 and October 19, 2016, both dates being approximate and inclusive, at McConnell Air Force Base, a place within the special maritime and territorial jurisdiction of the United States and in the District of Kansas, the defendant,

**RICHARD EMIL CHRISTENSEN,**

knowingly caused and attempted to cause MINOR VICTIM, a person who had not attained the age of 12 years, to engage in a sexual act, to wit: contact between **RICHARD EMIL CHRISTENSEN**'s penis and the vulva of MINOR VICTIM.

All in violation of Title 18, United States Code, Sections 2241(c) and 2246(2)(A).

**COUNT 2**

**ABUSIVE SEXUAL CONTACT – OF A MINOR  
[18 U.S.C. § 2244(a)(5)]**

Between October 21, 2012 and October 19, 2016, both dates being approximate and inclusive, at McConnell Air Force Base, a place within the special maritime and territorial jurisdiction of the United States and in the District of Kansas, the defendant,

**RICHARD EMIL CHRISTENSEN,**

knowingly engaged in and caused sexual contact with MINOR VICTIM, a person who had not attained the age of 12 years, to wit: the intentional touching, either directly or through the clothing, of the genitalia, groin, and inner thigh of MINOR VICTIM with an intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person.

All in violation of Title 18, United States Code, Sections 2244(a)(5) and 2246(3).

A TRUE BILL.

September 6, 2023  
DATE

s/Foreperson  
FOREPERSON OF THE GRAND JURY

KATE E. BRUBACHER  
UNITED STATES ATTORNEY

By: /s/ Jason Hart  
JASON HART, Ks. S. Ct. No. 20276  
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<p><b>IT IS REQUESTED THAT THE TRIAL BE HELD IN WICHITA, KANSAS</b></p>
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### **Count 1**

- Punishable by a term of imprisonment of not less than thirty (30) years and up to life. 18 U.S.C. § 2241(c).
- A term of supervised release of not less than five (5) years and up to life. 18 U.S.C. § 3583(k).
- A fine not to exceed \$250,000. 18 U.S.C. § 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).
- A mandatory special assessment of \$5,000.00 if defendant is a non-indigent person. 18 U.S.C. § 3014(a)(3).

### **Count 2**

- Punishable by a term of imprisonment of any term of years and up to life. 18 U.S.C. § 2244(a)(5).
- A term of supervised release of not less than five (5) years and up to life. 18 U.S.C. § 3583(k).
- A fine not to exceed \$250,000. 18 U.S.C. § 3571(b)(3).
- A mandatory special assessment of \$100.00. 18 U.S.C. § 3013(a)(2)(A).
- A mandatory special assessment of \$5,000.00 if defendant is a non-indigent person. 18 U.S.C. § 3014(a)(3).