

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

MAY 11 2010

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
 vs.)
)
 JEREMIAH JACKSON,)
)
 Defendant.)

CRIMINAL NO. 10-1374 MCA
Count 1: 18 U.S.C. § 2113(a):
Bank Robbery;
Counts 2 and 3: 18 U.S.C. §§
2113(a) and 2113(e): Bank
Robbery and Incidental Crimes,
Killing a Person.

INDICTMENT

The Grand Jury charges:

Count 1

On or about April 6, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **JEREMIAH JACKSON**, by force, violence, and intimidation, did take and attempt to take from the person and presence of another, a sum of money belonging to and in the care, custody, control, management, and possession of the New Mexico Bank and Trust, located at 3002 Louisiana NE, Albuquerque, New Mexico, the deposits of which were then insured by the Federal Deposit Insurance Corporation.

In violation of 18 U.S.C. § 2113(a).

Count 2

On or about April 6, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **JEREMIAH JACKSON**, by force, violence, and intimidation, did take and attempt to take from the person and presence of another, a sum of money belonging to and in the care, custody, control, management, and possession of the New Mexico

Bank and Trust, located at 3002 Louisiana NE, Albuquerque, New Mexico, the deposits of which were then insured by the Federal Deposit Insurance Corporation; and in committing such offense, the defendant, **JEREMIAH JACKSON**, in avoiding and attempting to avoid apprehension for the commission for such offense, and in freeing himself and attempting to free himself from arrest and confinement for such offense, did kill Kimberly Aragon-Nunez.

In violation of 18 U.S.C. §§ 2113(a) and 2113(e).

Count 3

On or about April 6, 2010, in Bernalillo County, in the District of New Mexico, the defendant, **JEREMIAH JACKSON**, by force, violence, and intimidation, did take and attempt to take from the person and presence of another, a sum of money belonging to and in the care, custody, control, management, and possession of the New Mexico Bank and Trust, located at 3002 Louisiana NE, Albuquerque, New Mexico, the deposits of which were then insured by the Federal Deposit Insurance Corporation; and in committing such offense, the defendant, **JEREMIAH JACKSON**, in avoiding and attempting to avoid apprehension for the commission for such offense, and in freeing himself and attempting to free himself from arrest and confinement for such offense, did kill Janice Flores.

In violation of 18 U.S.C. §§ 2113(a) and 2113(e).

A TRUE BILL:

/s/

FOREPERSON OF THE GRAND JURY

Assistant United States Attorney

May 5, 2010 (11:51am)