

FILED
U.S. DISTRICT COURT
DISTRICT OF NEW MEXICO

IN THE UNITED STATES DISTRICT COURT 2010 SEP 22 PM 4:08
FOR THE DISTRICT OF NEW MEXICO CLERK-LAS CRUCES

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

KEVIN MAURICE BROOKS and)
STEPHANIE ANN LANDON,)

Defendants.)

CRIMINAL NO. 10-1817 RB

Count 1: 18 U.S.C. § 2119: Attempted Carjacking and 18 U.S.C. § 2: Aiding and Abetting;

Count 2: 18 U.S.C. § 924(c)(1)(A)(iii): Using, Carrying and Discharging a Firearm During and in Relation to a Crime of Violence and 18 U.S.C. § 2: Aiding and Abetting.

Count 3: 18 U.S.C. §§ 922(g)(1) and 924(a)(2): Felon in Possession of a Firearm.

SECOND SUPERSEDING INDICTMENT

The Grand Jury charges:

Count 1

On or about September 27, 2009, in Grant County, in the District of New Mexico, the defendants, **KEVIN MAURICE BROOKS** and **STEPHANIE ANN LANDON**, with the intent to cause death and serious bodily harm, did attempt to take a motor vehicle, to wit: a gold 1998 Ford Taurus, bearing New Mexico license plate 070PDJ, that had been shipped, transported, and received in interstate commerce, from the person and presence of another, by force, violence, and intimidation.

In violation of 18 U.S.C. §§ 2119 and 2.

Count 2

On or about September 27, 2009, in Grant County, in the District of New Mexico, the defendants, **KEVIN MAURICE BROOKS** and **STEPHANIE ANN LANDON**, knowingly used, carried and discharged a firearm, to wit: a CZ 40P .40 caliber handgun, bearing serial number A085364, during and in relation to a crime of violence for which the defendants may be prosecuted in a court of the United States, as alleged in Count 1 of the Indictment, to wit: Attempted Carjacking, contrary to 18 U.S.C. § 2119.

In violation of 18 U.S.C. §§ 924(c)(1)(A)(iii) and 2.

Count 3

On or about September 27, 2009, in Grant County, in the District of New Mexico, the defendant, **KEVIN MAURICE BROOKS**, a person who had previously been convicted of felony crimes punishable by imprisonment for a term exceeding one year, to wit: False Statement in the Acquisition of a Firearm, in violation of 18 U.S.C. §§ 922(a)(6) and 924(a)(2), and Felon in Possession of a Firearm, in violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2), in *United States v. Kevin Maurice Brooks*, No. CR 88-80681-01, in United States District Court, Eastern District of Michigan, did knowingly possess, in and affecting commerce, a firearm, to wit: a CZ 40P, 40 caliber semi automatic pistol, bearing serial number A085364.

In violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2).

A TRUE BILL:

15/
FOREPERSON OF THE GRAND JURY

15/
Assistant United States Attorney

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