

Count 2

On or about April 8, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendants, **KAMRON KALLESTEWA and KADEN PANTEAH**, Indians, assaulted John Doe 2 with a dangerous weapon, specifically, a firearm, with the intent to do bodily harm, under circumstances separate and distinct from those alleged in Count 5.

In violation of 18 U.S.C. §§ 1153, 113(a)(3), and 2.

Count 3

On or about April 8, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **KAMRON KALLESTEWA**, an Indian, assaulted Jane Doe 1 with a dangerous weapon, specifically, a firearm, with intent to do bodily harm.

In violation of 18 U.S.C. §§ 1153, 113(a)(3).

Count 4

On or about April 8, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **KAMRON KALLESTEWA**, an Indian, assaulted Jane Doe 2 with a dangerous weapon, specifically, a firearm, with intent to do bodily harm.

In violation of 18 U.S.C. §§ 1153 and 113(a)(3).

Count 5

On or about April 8, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **KADEN PANTEAH**, an Indian, assaulted John Doe 1, John Doe 2, Jane Doe 1, and Jane Doe 2 with a dangerous weapon, specifically, a firearm, with intent to do bodily harm.

In violation of 18 U.S.C. §§ 1153 and 113(a)(3).

Count 6

On or about April 8, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **KAMRON KALLESTEWA**, knowingly used, carried, and brandished a firearm, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, assault with a dangerous weapon as charged in counts 1, 2, 3, and 4 of this indictment, and in furtherance of such crime, possessed and brandished said firearm.

In violation of 18 U.S.C. § 924(c)(1)(A)(ii).

Count 7

On or about April 8, 2023, in Indian Country, in McKinley County, in the District of New Mexico, the defendant, **KADEN PANTEAH**, knowingly used and carried a firearm, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, assault with a dangerous weapon as charged in counts 2 and 5 of this indictment, and possessed said firearm in furtherance of such crime, and the firearm was discharged.

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

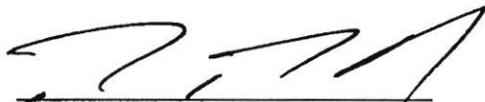
FORFEITURE ALLEGATIONS

Upon conviction of any offense in violation of 18 U.S.C. §§ 1153 and 113(a)(3) or 18 U.S.C. § 924(c), the defendants, **KAMRON KALLESTEWA** and **KADEN PANTEAH**, shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), any firearms and ammunition involved in the commission of the offense(s), including, but not limited to:

- a. a Taurus, model G3C, 9mm caliber pistol, serial number ACJ314187;

- b. approximately 11 rounds of 9mm caliber ammunition; and
- c. a Taurus, model G3C, 9mm caliber pistol, serial number ACG013389.

A TRUE BILL:


Assistant United States Attorney

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FOREPERSON OF THE GRAND JURY