

**FILED**

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEW MEXICO

AUG 25 2015

*M*

**MATTHEW J. DYKMAN**  
CLERK

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

**RICHMOND SAM,** )

Defendant. )

CRIMINAL NO. 15-3051 JB

Count 1: 18 U.S.C. §§ 1153 and 1111:  
Second Degree Murder;

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

Count 3: 18 U.S.C. § 924(c): Using,  
Carrying, Possessing, and Discharging a  
Firearm During and in Relation to and in  
Furtherance of a Crime of Violence.

INDICTMENT

The Grand Jury charges:

Count 1

On or about July 30, 2015, in Indian Country, in Sandoval County, in the District of New Mexico, the Defendant, **RICHMOND SAM**, an Indian, with malice aforethought did unlawfully kill John Doe, by shooting John Doe with a firearm.

In violation of 18 U.S.C. §§ 1153 and 1111.

Count 2

On or about July 30, 2015, in Indian Country, in Sandoval County, in the District of New Mexico, the Defendant, **RICHMOND SAM**, having been convicted of the following felony crime punishable by imprisonment for a term exceeding one year:

- (1) aggravated assault upon a peace officer.

knowingly possessed, in and affecting commerce, a firearm:

- (1) a Norinco, model AK-47, serial number 9305253.

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

Count 3

On or about July 30, 2015, in Sandoval County, in the District of New Mexico, the Defendant, **RICHMOND SAM**, knowingly possessed, used, carried, and discharged a firearm, a Norinco, model AK-47, serial number 9305253, during and in relation to a crime of violence for which the defendant may be prosecuted in a court of the United States, specifically, second degree murder as charged in Count 1 of this indictment.

In violation of 18 U.S.C. § 924(c).

FORFEITURE ALLEGATIONS

Upon conviction of the offenses alleged in this Indictment, the Defendant, **RICHMOND SAM**, shall forfeit to the United States pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c) any interest he may have in a Norinco, model AK-47, serial number 9305253.

A TRUE BILL:



Assistant United States Attorney

/s/  
FOREPERSON OF THE GRAND JURY

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