

SECOND JUDICIAL DISTRICT COURT  
COUNTY OF BERNALILLO  
STATE OF NEW MEXICO

2014 DEC 22 AM 9:34

No. **D202 CR 14005881**  
DA#: 2014-06473-3  
[REDACTED]

*Henry T. Paul*

STATE OF NEW MEXICO,  
Plaintiff,

**CHARLES W. BROWN**

vs.

SAMANTHA GARCIA,  
AKA: SAMANTHA M. GARCIA; SAMANTHA MONIQUE GARCIA  
Defendant.

**CRIMES CHARGED**

FIRST DEGREE MURDER (WILLFUL AND DELIBERATE), SECOND DEGREE MURDER (FIREARM ENHANCEMENT) AND MANSLAUGHTER (FIREARM ENHANCEMENT) (0001); CRIMINAL SOLICITATION TO COMMIT FIRST DEGREE MURDER (WILLFUL AND DELIBERATE)(0041)(2 COUNTS); CONSPIRACY TO COMMIT FIRST DEGREE MURDER (WILLFUL AND DELIBERATE)(0040)

**GRAND JURY INDICTMENT**

THE GRAND JURY CHARGES:

*TB* COUNT 1: FIRST DEGREE MURDER (WILLFUL AND DELIBERATE), SECOND DEGREE MURDER (FIREARM ENHANCEMENT) AND MANSLAUGHTER (FIREARM ENHANCEMENT) (0001)

That on or about the 10<sup>th</sup> day of October, 2014, in Bernalillo County, New Mexico, the above-named defendant did murder Eloi Leyba, with the deliberate intention to take away the life of Eloi Leyba, or any other human being, contrary to §30-2-1(A)(1), NMSA 1978; AND FURTHERMORE, the defendant is hereby notified that upon trial of this cause the finder of fact may be instructed to consider Murder in the Second Degree (Firearm Enhancement), contrary to §30-2-1(B) and §31-18-16, NMSA 1978, or Manslaughter (Firearm Enhancement), contrary to §30-2-3 and §31-18-16, NMSA 1978.

*TK* COUNT 2: CRIMINAL SOLICITATION TO COMMIT FIRST DEGREE MURDER (WILLFUL AND DELIBERATE) (0041)

That on or about the 10<sup>th</sup> day of October, 2014, in Bernalillo County, New Mexico, the above-named defendant solicit, command, request, induce and/ or employ to promote or facilitate another person to commit First Degree Murder, and the defendant intended that the person so solicited commit First Degree Murder, contrary to §30-28-3 and §30-2-1(A)(1), NMSA 1978.

TB COUNT 3: CRIMINAL SOLICITATION TO COMMIT FIRST DEGREE MURDER (WILLFUL AND DELIBERATE) (0041)

That on or about the 9<sup>th</sup> day of October, 2014, in Bernalillo County, New Mexico, the above-named defendant solicit, command, request, induce and/ or employ to promote or facilitate another person to commit First Degree Murder, and the defendant intended that the person so solicited commit First Degree Murder, contrary to §30-28-3 and §30-2-1(A)(1), NMSA 1978.

TB COUNT 4: CONSPIRACY TO COMMIT FIRST DEGREE MURDER (WILLFUL AND DELIBERATE)(0040)

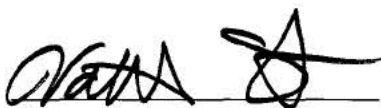
That on or about the 10<sup>th</sup> day of October, 2014, in Bernalillo County, New Mexico, the above-named defendant and another person by words or acts agreed together to commit First Degree Murder, and they intended to commit First Degree Murder, contrary to §30-28-2 and §30-2-1(A)(1), NMSA 1978.

The names of the witnesses upon whose testimony this Indictment is based are as follows:

M. Craver BCSO

I hereby certify that the foregoing Indictment is a True Bill.

APPROVED:



For: Greer Rose  
Deputy District Attorney



12-19-2014  
Date