

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

GARY M. RESTAINO  
United States Attorney  
District of Arizona  
MATTHEW C. CASSELL  
Assistant U.S. Attorney  
Colorado State Bar No. 38157  
405 W. Congress, Suite 4800  
Tucson, Arizona 85701-5040  
Telephone: (520) 620-7300  
Email: [Matthew.Cassell@usdoj.gov](mailto:Matthew.Cassell@usdoj.gov)  
Attorneys for Plaintiff

FILED

2023 JUL 19 PM 5:16

CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

**VICTIM**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Jaime Reyes Jacobo,

Defendant.

**CR23-01075 TUC-JCH(BGM)**

INDICTMENT

Violations:

18 U.S.C. §§ 7 and 1113  
(Attempted Murder)  
Count One

18 U.S.C. §§ 7 and 113(a)(1)  
(Assault with Intent to Commit Murder)  
Count Two

18 U.S.C. §§ 7 and 113(a)(3)  
(Assault with a Dangerous Weapon)  
Count Three

18 U.S.C. §§ 7 and 113(a)(3)  
and 3559(f)(3)  
(Assault with a Dangerous Weapon  
of a Child Under the Age of 18 Years)  
Count Four

18 U.S.C. § 924(c)(1)(A)(iii)  
(Use of a Firearm During a Crime of  
Violence)  
Counts Five through Eight

18 U.S.C. §§ 7 and 113(a)(8)  
(Assault of a Spouse by Strangling)  
Count Nine

18 U.S.C. §§ 922(g)(1) and 924(a)(8)  
(Prohibited Possession of a Firearm and  
Ammunition)  
Count Ten

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

18 U.S.C. §§ 1791(a)(2), (b)(2), (d)(1)(A),  
and (d)(4)  
(Possession of a Firearm in Prison)  
Count Eleven  
  
18 U.S.C. § 924(d)  
28 U.S.C. § 2461(c)  
Forfeiture Allegation

**THE GRAND JURY CHARGES:**

**COUNT ONE**

On or about November 13, 2022, in the District of Arizona, at a place within the special maritime and territorial jurisdiction of the United States, namely United States Penitentiary Satellite Prison Camp – Tucson, on land acquired for the use of the United States and under its exclusive jurisdiction, JAIME REYES JACOBO, with premeditation and malice aforethought, did unlawfully attempt to kill I.R., in violation of Title 18, United States Code, Sections 7 and 1113.

**COUNT TWO**

On or about November 13, 2022, in the District of Arizona, at a place within the special maritime and territorial jurisdiction of the United States, namely United States Penitentiary Satellite Prison Camp – Tucson, on land acquired for the use of the United States and under its exclusive jurisdiction, JAIME REYES JACOBO, did intentionally and knowingly assault I.R. with intent to commit murder, in violation of Title 18, United States Code, Sections 7 and 113(a)(1).

**COUNT THREE**

On or about November 13, 2022, in the District of Arizona, at a place within the special maritime and territorial jurisdiction of the United States, namely United States Penitentiary Satellite Prison Camp – Tucson, on land acquired for the use of the United States and under its exclusive jurisdiction, JAIME REYES JACOBO, did intentionally and knowingly assault I.R. with a dangerous weapon, that is, an A-25 Sundance 25 ACP semi-

1 automatic pistol, with intent to do bodily harm, in violation of Title 18, United States Code,  
2 Sections 7 and 113(a)(3).

3 **COUNT FOUR**

4 On or about November 13, 2022, in the District of Arizona, at a place within the  
5 special maritime and territorial jurisdiction of the United States, namely United States  
6 Penitentiary Satellite Prison Camp – Tucson, on land acquired for the use of the United  
7 States and under its exclusive jurisdiction, JAIME REYES JACOBO, did intentionally and  
8 knowingly assault John Doe, a child under the age of 18 years, with a dangerous weapon,  
9 that is, an A-25 Sundance 25 ACP semi-automatic pistol, with intent to do bodily harm, in  
10 violation of Title 18, United States Code, Sections 7 and 113(a)(3) and 3559(f)(3).

11 **COUNT FIVE**

12 On or about November 13, 2022, in the District of Arizona, JAIME REYES  
13 JACOBO, did knowingly use, carry, and discharge a firearm during and in relation to a  
14 crime of violence, that is, Attempted Murder as alleged in Count One, in violation of Title  
15 18, United States Code, Sections 7 and 1113, all in violation of Title 18 United States Code,  
16 Section 924(c)(1)(A)(iii).

17 **COUNT SIX**

18 On or about November 13, 2022, in the District of Arizona, JAIME REYES  
19 JACOBO, did knowingly use, carry, and discharge a firearm during and in relation to a  
20 crime of violence, that is, Assault with Intent to Commit Murder as alleged in Count Two,  
21 in violation of Title 18, United States Code, Sections 7 and 113(a)(1), all in violation of  
22 Title 18, United States Code, Section 924(c)(1)(A)(iii).

23 **COUNT SEVEN**

24 On or about November 13, 2022, in the District of Arizona, JAIME REYES  
25 JACOBO, did knowingly use, carry, and discharge a firearm during and in relation to a  
26 crime of violence, that is, Assault with a Dangerous Weapon as alleged in Count Three, in  
27 violation of Title 18, United States Code, Sections 7 and 113(a)(3), all in violation of Title  
28 18, United States Code, Section 924(c)(1)(A)(iii).



**FORFEITURE ALLEGATION**

Upon conviction of this Indictment, the defendant, JAIME REYES JACOBO, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c), any firearms and ammunition involved in the commission of the offense, including, but not limited to one an A-25 Sundance 25 ACP semi-automatic pistol with serial number 066842, and eight rounds of ammunition.

If any of the property described above, as a result of any act or omission of the defendant: a) cannot be located upon the exercise of due diligence; b) has been transferred or sold to, or deposited with, a third party; c) has been placed beyond the jurisdiction of the court; d) has been substantially diminished in value; or e) has been commingled with other property which cannot be divided without difficulty, it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property, including, but not limited to, all property, both real and personal, owned by the defendant.

All pursuant to Title 18, United States Code, Section 924(d); Title 28, United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.

A TRUE BILL

/s/  
Presiding Juror  
Dated: July 19, 2023

GARY M. RESTAINO  
United States Attorney  
District of Arizona

CONTACT FOR  
PUBLIC DISCLOSURE

/S/

MATTHEW C. CASSELL  
Assistant U.S. Attorney