

murdered a human being, James Wright, a/k/a Ronnie Mo, willfully, deliberately, maliciously
and with premeditation.

18 U.S.C. § 924(c), (j)

18 U.S.C. § 1111

18 U.S.C. § 2

COUNT TWO

And the Grand Jury for the District of Maryland further charges that: On or about September 21, 2007, in the State and District of Maryland,

**KYLE STEVENS,
a/k/a Cappo,**

the defendant herein, did knowingly possess and discharge a firearm, a .380 caliber semiautomatic, in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a court of the United States, that is, conspiracy to distribute and possess with intent to distribute controlled substances, in violation of 21 U.S.C. § 846, as set forth in Count Three of this Indictment, and caused the death of a person through the use of said firearm, a killing that was a murder as defined in Title 18, United States Code, Section 1111, in that the defendant murdered a human being, Keith Ray, a/k/a Keithy, willfully, deliberately, maliciously and with premeditation.

18 U.S.C. § 924(c), (j)
18 U.S.C. § 1111
18 U.S.C. § 2

COUNT THREE

The Grand Jury for the District of Maryland charges that:

From in or about 2005, to on or about the date of this Indictment, in the State and District of Maryland and elsewhere, the defendant,

**KYLE STEVENS,
a/k/a Cappo,**

did knowingly and willfully combine, conspire, confederate, and agree with others known and unknown to the Grand Jury, to knowingly, intentionally, and unlawfully distribute and possess with intent to distribute a quantity of a mixture or substance containing heroin, a Schedule I controlled substance, a quantity of a mixture or substance containing cocaine, a Schedule II controlled substance, 280 grams or more of a quantity of a mixture or substance containing cocaine base, or “crack,” a Schedule II controlled substance, and a quantity of a mixture or substance containing oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

21 U.S.C. § 846

ROD J. ROSENSTEIN
United States Attorney

A TRUE BILL:

Foreperson

Date: _____

