

**FILED**

NOV 05 2020

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

Mark C. McCartt, Clerk  
U.S. DISTRICT COURT

UNITED STATES OF AMERICA, ) Case No. **20 CR 276 GKF**  
)  
Plaintiff, ) **INDICTMENT**  
) [COUNT 1: 18 U.S.C. §§ 1151, 1153,  
v. ) and 1111 – First Degree Murder in  
) Indian Country;  
SHANNON JAMES KEPLER, ) COUNT 2: 18 U.S.C. § 924(j) –  
) Causing Death by Using and  
Defendant. ) Discharging a Firearm During and in  
) Relation to Crimes of Violence;  
) COUNT 3: 18 U.S.C. §§ 1151, 1153,  
) and 113(a)(3) – Assault With a  
) Dangerous Weapon in Indian  
) Country;  
) Forfeiture Allegation: 18 U.S.C.  
) § 924(d)(1) and 28 U.S.C. § 2461(c) –  
) Firearm Forfeiture]

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**[18 U.S.C. §§ 1151, 1153, and 1111]**

On or about August 5, 2014, within Indian Country in the Northern District of Oklahoma, the defendant, **SHANNON JAMES KEPLER**, an Indian male, willfully, deliberately, maliciously, and with premeditation and malice aforethought did unlawfully kill Jeremey Lake by shooting him multiple times with a firearm.

In violation of Title 18, United States Code, Sections 1151, 1153, and 1111.

**COUNT TWO**  
**[18 U.S.C. § 924(j)]**

On or about August 5, 2014, within Indian Country in the Northern District of Oklahoma, the defendant, **SHANNON JAMES KEPLER**, an Indian male, knowingly used and discharged a firearm during and in relation to crimes of violence, to wit: 1) First Degree Murder in Indian Country, and 2) Second Degree Murder in Indian Country, in violation of Title 18, United States Code, Sections 1151, 1153, and 1111, offenses for which the defendant may be prosecuted in a court of the United States, in violation of Title 18, United States Code, Section 924(c)(1)(A), and in the course of committing a violation of Title 18, United States Code, 924(c)(1)(A) caused the death of Jeremey Lake through the use of a firearm, and the killing constituted murder, as defined in Title 18, United States Code, Section 1111.

All in violation of Title 18, United States Code, Section 924(j)(1).

**COUNT THREE**  
**[18 U.S.C. §§ 1151, 1153, and 113(a)(3)]**

On or about August 5, 2014, within Indian Country in the Northern District of Oklahoma, the defendant, **SHANNON JAMES KEPLER**, an Indian male, with intent to do bodily harm, did assault and attempt to assault M.H., a male known to the Grand Jury, with a dangerous weapon, that is, by discharging a firearm at M.H.

In violation of Title 18, United States Code, Sections 1151, 1153, and 113(a)(3).

**FORFEITURE ALLEGATION**  
**[18 U.S.C. § 924(d)(1) and 28 U.S.C. § 2461(c)]**

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense alleged in Count Two of this Indictment, as a part of his sentence, the defendant, **SHANNON JAMES KEPLER**, shall forfeit to the United States any firearm and ammunition involved in or used in the knowing commission of such offense.

All pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c).

R. TRENT SHORES  
UNITED STATES ATTORNEY

A TRUE BILL



\_\_\_\_\_  
ROSS E. LENHARDT  
Assistant United States Attorney

*/s/Grand Jury Foreperson*  
\_\_\_\_\_  
Grand Jury Foreperson