

THE STATE OF NEW HAMPSHIRE
INDICTMENT

Rockingham, SS.

February Term, 2009

At the Superior Court, holden at Brentwood, within and for the County of Rockingham aforesaid, on the 4th day of February in the year of our Lord two thousand and nine,

THE GRAND JURORS FOR THE STATE OF NEW HAMPSHIRE, upon oath, present that:

JESSE T. BROOKS
(D.O.B. 12/11/76)

of Las Vegas, Nevada, on or between the 30th day of September, 2003, and the 31st day of August, 2005, at various locations in the County of Rockingham aforesaid, did commit the crime of

Conspiracy to Commit Murder
(RSA 629:3, I, IV; 630:1, I(b) (c))

in that, with the purpose that the crime of murder be committed, he agreed with John Brooks, and/or Joseph Vrooman, and/or Robin Knight, and/or Michael Benton, and/or Andrew Carter to cause the death of Jack Reid, Sr., and one or more of the following overt acts was committed in furtherance of the conspiracy:

1. John Brooks asked Michael Benton to kill Jack Reid, Sr. in exchange for an amount of money; and/or
2. John Brooks asked Andrew Carter to kill Jack Reid, Sr. in exchange for an amount of money; and/or
3. John Brooks provided Michael Benton and/or Andrew Carter with a shotgun; and/or
4. Andrew Carter dropped Michael Benton off near Jack Reid, Sr.'s home; and/or
5. Michael Benton waited outside Jack Reid Sr.'s home with a shotgun; and/or
6. Jesse Brooks and Michael Benton traveled to Jack Reid Sr.'s home with a "mag" flashlight and a baseball bat to use as weapons; and/or

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7. John Brooks asked Joseph Vrooman to help him kill Jack Reid, Sr. in exchange for an amount of money; and/or
8. Joseph Vrooman obtained a stun gun and/or handcuffs and/or pepper spray; and/or
9. Jesse Brooks contacted Michael Benton to assist in the plan to kill Jack Reid, Sr.; and/or
10. John Brooks, Jesse Brooks and Joseph Vrooman held a meeting in Las Vegas to discuss details of the plan to kill Jack Reid, Sr.; and/or
11. John Brooks sent a package containing a stun gun and/or handcuffs and/or pepper spray *via* Federal Express to 145 North Rd. in Deerfield, New Hampshire; and/or
12. John Brooks traveled from Nevada to New Hampshire on or about June 17, 2005; and/or
13. Joseph Vrooman traveled from Nevada to New Hampshire on or about June 17, 2005; and/or
14. John Brooks, Joseph Vrooman, and Michael Benton held a meeting in Manchester to discuss the plan to kill Jack Reid, Sr.; and/or
15. Michael Benton purchased a cellular telephone; and/or
16. Michael Benton activated a cellular telephone under the name "Charlie Was"; and/or
17. John Brooks asked Robin Knight to help him kill Jack Reid, Sr.; and/or
18. John Brooks asked Robin Knight to call Jack Reid, Sr. on the "Charlie Was" cellular telephone; and/or
19. Robin Knight called Jack Reid, Sr. on the "Charlie Was" cellular telephone to set up an appointment with him at 145 North Rd. in Deerfield, New Hampshire; and/or
20. John Brooks and/or Joseph Vrooman purchased "zip ties," a plastic tarp, and cellophane; and/or

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21. John Brooks traveled to Manchester to pick up Michael Benton; and/or
22. John Brooks, Robin Knight, Joseph Vrooman, and Michael Benton drove around together looking for a place to conceal the body of Jack Reid, Sr.; and/or
23. John Brooks traveled to 145 North Rd. in Deerfield, New Hampshire on June 27, 2005; and/or
24. Joseph Vrooman traveled to 145 North Rd. in Deerfield, New Hampshire on June 27, 2005; and/or
25. Robin Knight traveled to 145 North Rd. in Deerfield, New Hampshire on June 27, 2005; and/or
26. Michael Benton traveled to 145 North Rd. in Deerfield, New Hampshire on June 27, 2005; and/or
27. John Brooks brought a handgun with him to 145 North Rd. in Deerfield, New Hampshire; and/or
28. John Brooks, Robin Knight, Joseph Vrooman and/or Michael Benton brought the tarp, zip ties, and cellophane to 145 North Rd. in Deerfield; and/or
29. John Brooks, Robin Knight, Joseph Vrooman and/or Michael Benton brought a change of clothing with them to 145 North Rd. in Deerfield; and/or
30. John Brooks and/or Michael Benton informed Joseph Vrooman and Robin Knight that Michael Benton would strike Jack Reid, Sr. with a sledgehammer; and/or
31. Robin Knight and Joseph Vrooman led Jack Reid, Sr. into a barn attached to the residence at 145 North Rd., Deerfield, New Hampshire; and/or
32. Michael Benton concealed himself in a small closet/commode in the barn attached to the residence at 145 North Rd., Deerfield with the sledgehammer; and/or
33. John Brooks waited for Jack Reid, Sr. in the barn attached to the residence at 145 North Rd., Deerfield, New Hampshire; and/or
34. Michael Benton struck Jack Reid, Sr. in the head with a sledgehammer; and/or

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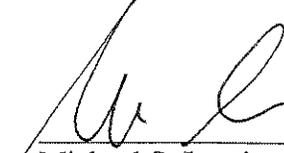
35. John Brooks struck Jack Reid, Sr. in the chest with a sledgehammer; and/or
36. John Brooks, Robin Knight, Joseph Vrooman and/or Michael Benton wrapped the body of Jack Reid, Sr. in plastic; and/or
37. John Brooks, Robin Knight, Joseph Vrooman and Michael Benton left Jack Reid, Sr.'s body in the bed of his dump truck in Saugus, Massachusetts; and/or
38. Robin Knight, John Brooks, Joseph Vrooman, and/or Michael Benton cleaned up the victim's blood in the barn attached to the residence at 145 North Rd. in Deerfield; and/or
39. John Brooks and Joseph Vrooman disposed of property belonging to Jack Reid, Sr.; and/or
40. John Brooks, Joseph Vrooman, Robin Knight, and/or Michael Benton disposed of the clothing they wore on June 27, 2005; and/or
41. John Brooks and/or Joseph Vrooman disposed of the "Charlie Was" cellular phone; and/or
42. John Brooks, Robin Knight, Joseph Vrooman and/or Michael Benton disposed of the keys to Jack Reid, Sr.'s dump truck; and/or
43. John Brooks and Joseph Vrooman threw a hammer and handcuffs into the river in Newcastle, New Hampshire; and/or
44. John Brooks, Joseph Vrooman and/or Robin Knight ripped out the walls and floor from the small closet/commode in the attached barn at 145 North Rd. in Deerfield; and/or
45. John Brooks, Robin Knight and/or Joseph Vrooman disposed of that wood at a residence in Danville, New Hampshire; and/or
46. Robin Knight, Joseph Vrooman and/or John Brooks replaced the walls and floor of the small closet/commode in the attached barn at 145 North Rd. in Deerfield; and/or
47. John Brooks paid Michael Benton a sum of money; and/or
48. John Brooks paid Joseph Vrooman a sum of money; and/or

49. Jesse Brooks paid Joseph Vrooman a sum of money; and/or
50. John Brooks, Robin Knight, Joseph Vrooman and Michael Benton participated in a meeting in Las Vegas to devise a cover story to explain the murder of Jack Reid, Sr.;

contrary to the form of the Statute, in such case made and provided, and against the peace and dignity of the State.

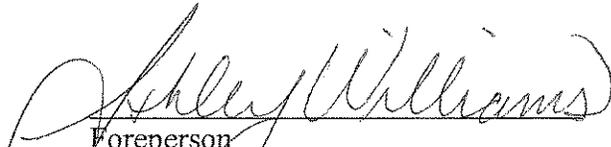


Janice K. Rundles
Senior Assistant Attorney General



Michael S. Lewis
Assistant Attorney General

This is a true bill.



Foreperson

DATED: February 4, 2009

Name: Jesse T. Brooks
DOB: 12/11/76
Address: 2670 Harbor Hills Lane
Las Vegas, Nevada 89117
RSA: RSA 629:3, I, IV; 630:1, I(b)(c)