

FILED

UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

United States District Court

MAR 25 2010

State and DISTRICT OF New Mexico

MATTHEW J. DYKMAN
CLERK

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

CHEBON JOE WILSON
YOB: 1983
SSAN: XXX-XX-5871

CASE NUMBER: *DMJ 842*

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 14, 2010 in San Juan county, in the State and District of New Mexico defendant(s) did, (Track Statutory Language of Offense)

unlawfully engaged in sexual acts with Jane Doe 1 (Age 6) and Jane Doe 2 (Age 8) by using his hand/finger to penetrate their genital opening. The defendant and both victims are enrolled in the Navajo Indian Census Roll and the crime was committed within the confines of the Navajo Indian Reservation.

in violation of Title 18 United States Code, Section(s) 1153, 2241(c), 2246(2)(C)

I further state that I am a(n) Special Agent, FBI and that this complaint is based on the following facts:
Official Title

See Attached Affidavit.

Continued on the attached sheet and made a part hereof: Yes No

Sworn to before me and subscribed in my presence,

Cary Cahoon

Signature of Complainant
Cary Cahoon
Special Agent
ALBUQUERQUE, NEW MEXICO
Federal Bureau of Investigation

3/25/10 at _____
Date **Alan C. Torgerson**
U.S. Magistrate Judge

Name & Title of Judicial Officer

City and State
Alan C. Torgerson

Signature of Judicial Officer

1 IN THE UNITED STATES DISTRICT COURT
2 DISTRICT OF NEW MEXICO

3
4
5 State of NEW MEXICO

6 County of SAN JUAN

7 AFFIDAVIT

8 I, Cary Cahoon, being duly sworn, hereby depose
9 and say:

10 1. I am a Special Agent with the United States
11 Department of Justice, Federal Bureau of Investigation
12 (FBI) and have been employed as such since 1999. I am
13 currently assigned to the Albuquerque Division of the FBI,
14 Farmington Resident Agency, and have primary investigative
15 responsibility in crimes that occur in Indian Country,
16 including violent crimes such as homicide, robbery, arson,
17 aggravated assault, and sexual assault. The information
18 set forth in this affidavit has been derived from an
19 investigation conducted by affiant, Criminal Investigator
20 Marc Scott of the Navajo Nation Department of Public
21 Safety, FBI Task Force Officer Carl Sexton, and/or
22 communicated to me by other law enforcement officers.

23
24 2. On or around February 14, 2010, Chebon Joe
25 Wilson (hereinafter referenced as Chebon) engaged in sexual
26 acts with Jane Doe 1 (Age 6) and Jane Doe 2 (Age 8) by
27 using his hand/finger to penetrate their genital opening.
28 The defendant and both victims are enrolled in the Navajo

1 Indian Census Roll and the crimes set forth below were
2 committed within the confines of the Navajo Indian
3 Reservation.

4
5 3. On February 18, 2010, at approximately 1936
6 hours, Vera Jackson, the grandmother of Jane Doe 1 (Birth
7 Year 2003) and Jane Doe 2 (Birth Year 2001), contacted the
8 Shiprock Police Department to report a child molesting of
9 her aforementioned granddaughters by their stepfather,
10 Chebon Wilson (Birth Year 1983). Shortly thereafter,
11 Officer Anderson Dez with the Shiprock Police Department
12 responded to the residence 1/4 mile east of the 7-11 Store
13 in Shiprock, New Mexico. Upon his arrival, Officer Dez met
14 with Cheryl Wilson, the mother of Jane Doe 1 and Jane Doe
15 2. Cheryl Wilson reported that Chebon was touching the
16 private parts of her two daughters, Jane Doe 1 and Jane Doe
17 2. Cheryl Wilson learned about the above allegations from
18 Vera Jackson, who received a note from Jane Doe 1 that
19 said, "I hate Chebon, he digs in my private."
20

21 4. On February 18, 2010, at approximately 2210
22 hours, Cheryl Wilson took her daughters, Jane Doe 1 and
23 Jane Doe 2, to the Emergency Room at the Northern Navajo
24 Medical Center (NNMC). At approximately 0145 hours
25 (February 19, 2010), Dr. Sandra Beirne with NNMC Pediatrics
26 interviewed Jane Doe 1 and Jane Doe 2 based on the
27 allegations of sexual assault by their stepfather, Chebon.
28 Jane Doe 1 told Dr. Beirne that Chebon touched her privates

1 with his hand when they were laying on the bed in her
2 "mommy's bedroom." Jane Doe 1 reported that it happened on
3 Sunday (February 14, 2010), and that it also happened on
4 ten other occasions. Jane Doe 1 stated that it happened
5 the first time when she was five years of age. She also
6 stated that it hurt when Chebon touched her privates. Jane
7 Doe 2 told Dr. Beirne that on or around February 16, 2010,
8 Chebon touched her privates with his hand while they were
9 laying together on her baby sister's bed watching
10 television. Jane Doe 2 said that Chebon Wilson has not
11 touched her privates before or since then. Jane Doe 2 also
12 reported that she was scared of Chebon.

13
14 5. On February 19, 2010, the Sexual Assault
15 Services of NW New Mexico (SANE) located in Farmington, New
16 Mexico, conducted sexual assault examinations on both Jane
17 Doe 1 and Jane Doe 2. Kathy Barrett, SANE Coordinator,
18 advised affiant that the preliminary results of the sexual
19 assault examinations for both girls were negative and did
20 not reflect any injuries to the girls, however, the
21 official report which is reviewed by a medical doctor, is
22 forthcoming and will be released to affiant at a later
23 date.

24
25 6. On February 26, 2010, Letitia Lee with Child
26 Haven in Farmington, New Mexico, conducted a forensic
27 interview with Jane Doe 1 at Child Haven in reference to
28 the allegations that her stepfather, Chebon Wilson,

1 sexually assaulted her. Jane Doe 1 provided detailed
2 information about how Chebon touched and penetrated her
3 vagina with his finger. Jane Doe 1 stated that this
4 occurred on multiple occasions (Affiant's recollection
5 since the forensic interview was that Jane Doe 1 stated it
6 occurred approximately eight different times) in her
7 mother's bedroom while watching television. Jane Doe 1
8 stated that Chebon would lie next to her on the bed and
9 would put his hand down her pants and touch her privates in
10 the front but not the back. Jane Doe 1 said that her
11 clothes were always on and so were Chebon's clothes. Jane
12 Doe 1 also said that Chebon never touched her privates with
13 anything other than his hand/finger. Jane Doe 1 said that
14 when Chebon would put his finger in her privates it hurt.
15 Jane Doe 1 also drew pictures and marked on several pieces
16 of paper what happened and where Chebon touched her.

17
18 7. On February 26, 2010, Letitia Lee with Child
19 Haven in Farmington, New Mexico, conducted a forensic
20 interview with Jane Doe 2 at Child Haven in reference to
21 the allegations that her stepfather, Chebon Wilson,
22 sexually assaulted her. Jane Doe 2 seemed more reluctant
23 to talk than her sister. Jane Doe 2 stated that Chebon
24 only touched her privates in the front on one occasion
25 while they were watching television together in her
26 mother's room. Jane Doe 2 said nothing else happened and
27 that their clothes were on during the incident. It is
28 affiant's recollection that Jane Doe 2 did not disclose

1 that Chebon penetrated her privates with his finger or any
2 other object, but that he did put his hand down her pants
3 and touched her vagina. Jane Doe 2 also marked on a piece
4 of paper where Chebon touched her.

5
6 8. Between the time period of February 22, 2010,
7 when the above-referenced information was first reported to
8 the FBI, and March 23, 2010, affiant attempted to locate
9 Chebon to interview him, but was unsuccessful in finding
10 him.

11
12 9. On March 24, 2010, at approximately 0830
13 hours, affiant learned from FBI Task Force Officer Carl
14 Sexton that Chebon Wilson was in custody and currently at
15 the Magistrate Court in Farmington, New Mexico, on
16 unrelated charges.

17
18 10. On March 24, 2010, at approximately 1030
19 hours, affiant and FBI Task Force Officer Carl Sexton
20 interviewed Chebon Wilson in a room at the Farmington
21 Magistrate Court regarding the above-referenced sexual
22 assault allegations. Chebon was read his Miranda Rights
23 and then signed an FBI Advice of Rights form giving consent
24 to answer questions and talk to the interviewing
25 agents/officers without an attorney present.

26
27 11. In summary, Chebon Wilson told the agents he
28 received some drugs/pills (eight or nine) in a prescription

1 bottle from a stranger on the street in Farmington sometime
2 in February 2010. Chebon wanted the drugs/pills because he
3 was having headaches. Chebon had not been to his residence
4 in Shiprock where Cheryl Wilson, his wife, and daughters
5 were living for several days. Two or three days after
6 taking the drugs/pills, Chebon went to his residence and
7 that is when he touched Jane Doe 1 and Jane Doe 2's
8 privates. Chebon confessed to putting his hand down Jane
9 Doe 1's pants while she and Chebon were on his bed watching
10 television. He also confessed to doing it on four or five
11 separate occasions. Chebon said he assumed he penetrated
12 Jane Doe 1's vagina with his finger but was not positive
13 because of the drugs/pills he had taken. Chebon said he
14 did not realize what he was doing to Jane Doe 1 each time
15 until he "snapped" from the drugs, and then he would take
16 his hand out of Jane Doe 1's pants. Chebon used the term
17 "snapped" throughout the interview to mean that he came to
18 and realized what he was doing. Throughout the interview
19 Chebon blamed the drugs/pills he had taken for what he did
20 sexually with Jane Doe 1 and Jane Doe 2.

21
22 12. Chebon confessed to touching Jane Doe 2's
23 privates on one or two occasions while watching television
24 in his bedroom on the bed. Chebon confessed to doing the
25 same thing with Jane Doe 2 as he had with Jane Doe 1.
26 Chebon denied having intercourse with Jane Doe 1 and Jane
27 Doe 2, and also denied touching them anywhere other than in
28 their vagina area. Chebon said he and his stepdaughters

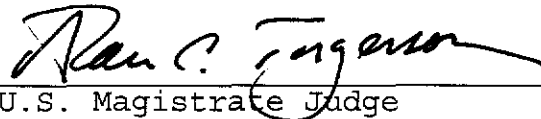
1 were always fully clothed when he touched their private
2 areas.

3
4 13. Based upon the information provided in this
5 affidavit your affiant believes there is probable cause to
6 believe that Chebon Wilson violated Title 18 United States
7 Code, Sections 1153, 2241(c), and 2246(2)(C). I swear this
8 information to be true and correct to the best of my
9 knowledge and belief.

10
11 

12 _____
13 Cary Cahoon
14 Special Agent
15 Federal Bureau of Investigation
16 Albuquerque, New Mexico

17 Subscribed and sworn to before me this 25 day
18 of March, 2010.

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U.S. Magistrate Judge