

# United States District Court

State and

**FILED** DISTRICT OF

New Mexico

UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

V.

RAYMOND JOSEPH MARTIN

Year of Birth: 1948

SSAN: XXX-XX-7231

APR - 6 2010

CRIMINAL COMPLAINT

CASE NUMBER:

10MJ 984

MATTHEW J. DYKMAN  
CLERK

(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 years 2008, 2009, and up and into February, 2010 in Sandoval county, in the state and District of New Mexico defendant(s) did,

sexually assault Jane Doe, a juvenile female who had not yet reached the age of twelve years, by penetrating the genital opening with his fingertips, by intentionally touching, not through the clothing, her vaginal area with his hand, and by intentionally touching, through the clothing, her vaginal area and buttocks with his hand; said sexual assault occurred in Indian Country within the exterior boundaries of the Laguna Pueblo

in violation of Title 18 United States Code, Section(s) 1153, 2241(c), 2246(2)(c), 2246(2)(d) and 2246(3)

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

facts: See attached Affidavit.

Continued on the attached sheet and made a part hereof:

☒ YES

☐ No

Sworn to before me and subscribed in my presence,

Signature of Complainant

CHRISTOPHER J. GEIGER  
Special Agent,  
Federal Bureau of Investigation

April 6, 2010

Date

at

Albuquerque, New Mexico

City and State

U.S. Magistrate Judge

Name & Title of Judicial Officer

Signature of Judicial Officer

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA )

VS. )

RAYMOND MARTIN )

Year of birth: 1948 )

SSAN: XXX-XX-7231 )

AFFIDAVIT

I, the undersigned, being duly sworn, hereby depose  
and state as follows:

1. I am a Special Agent (SA) of the Federal Bureau of  
Investigation (FBI) and have been employed in that capacity  
since February of 2009. I am currently assigned to the  
Albuquerque Division and have primary investigative  
responsibilities in major crimes, violent actions, and federal  
violations. The information set forth in this affidavit has  
been derived from my own investigation or communicated to me by  
other sworn law enforcement officers or from other reliable  
sources.

2. On February 12, 2010, the Laguna Pueblo Police  
Department initiated an investigation regarding the alleged  
sexual abuse of Jane Doe, year of birth 2000, by her  
grandfather, Raymond Martin, year of birth 1948, Social Security  
account number XXX-XX-7231. Both Jane Doe and Raymond Martin  
are enrolled members of Laguna Pueblo, and the assault occurred  
within the exterior boundaries of Laguna Pueblo. The

1 investigation was referred to the Albuquerque Division, FBI on  
2 February 23, 2010.

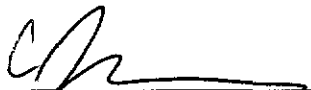
3  
4 3. On March 4, 2010, Jane Doe was interviewed at the All  
5 Faiths Receiving Home Children's Safehouse, in Albuquerque, New  
6 Mexico. During that interview, Jane Doe disclosed that her  
7 grandfather, Ray Martin, touched her on her vagina on multiple  
8 occasions. She disclosed that in one instance, Martin came into  
9 her bedroom, grabbed her, pulled down her pants, held her and  
10 then directly touched her vagina with his hand. She recalled  
11 that in another instance her brother observed Martin touching  
12 her, and that Martin then stopped. In all, Jane Doe disclosed  
13 that Martin had touched her on her vagina in at least four  
14 different rooms in her residence, including her bedroom, the  
15 kitchen, the hallway and the living room.

16  
17 4. On April 2, 2010, Raymond Martin, year of birth 1948,  
18 social security account number XXX-XX-7231 was located at his  
19 residence in Mesita Village, Laguna Pueblo, and interviewed by  
20 FBI SA Christopher J. Geiger and FBI SA Anthony J. Costanza.  
21 During the interview, Martin confessed to touching Jane Doe on  
22 four occasions, though he admitted there may have been more  
23 instances. Martin recalled that when Jane Doe was approximately  
24 eight years old he entered her bedroom and placed his hand  
25 directly on her vagina, under her jeans and underwear. He  
26 further described how, at this time, his fingertips slightly  
27 penetrated her vagina. Martin recalled that when Jane Doe was  
28 approximately nine years old he put his hand under her jeans and

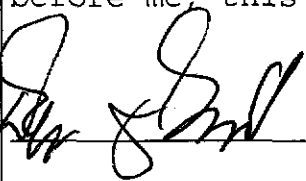
1 touched her on her vaginal area, over her underwear, in the  
2 kitchen of his residence. He further stated that Jane Doe's  
3 brother walked into the kitchen during this incident, and  
4 observed Martin touching Jane Doe. Martin also admitted to  
5 touching Jane Doe on her vaginal area over her jeans, while the  
6 two of them were in the hallway of the residence. Finally,  
7 Martin recalled that when Jane Doe was approximately ten years  
8 old, he entered her bedroom at approximately 4:00 p.m. in the  
9 afternoon and touched her buttocks over her pants while she was  
10 napping.

11  
12 5. Based on the information set forth in this affidavit,  
13 your affiant submits that there is probable cause to believe  
14 that in the years 2008, 2009, and up and into February 2010,  
15 Raymond Martin, a 61 year-old male and enrolled member of Laguna  
16 Pueblo, did sexually assault a juvenile female who had not yet  
17 reached the age of twelve years and who is an enrolled member of  
18 Laguna Pueblo, by penetrating the genital opening with his  
19 fingertips, by intentionally touching, not through the clothing,  
20 her vaginal area with his hand, and by intentionally touching,  
21 through the clothing, her vaginal area and buttocks with his  
22 hand; and that said sexual assault occurred in the state and  
23 district of New Mexico, within Indian Country, in violation of  
24 Title 18, United States code, Sections 1153, 2241(c),  
25 2246(2)(c), 2246(2)(d) and 2246(3).

1  
2 I swear that this information is true and correct to  
3 be best of my knowledge.

4  
5   
6 Christopher J. Geiger  
7 Special Agent,  
8 Federal Bureau of Investigation

9 Subscribed to and sworn to  
10 before me, this 6th of April, 2010

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12

13 UNITED STATES MAGISTRATE,  
14 Albuquerque, NM

15 Reviewed and approved by SAUSA Charles Barth  
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