

**United States District Court**

IN THE

UNITED STATES DISTRICT COURT  
DISTRICT OF  
ALBUQUERQUE, NEW MEXICO

UNITED STATES OF AMERICA

JAN 12 2010

v.

CRIMINAL COMPLAINT

VINSON SIX Jr., YOB: 1978  
NELVIN RAY WILLIE, YOB: 1985

**MATTHEW J. DYKMAN**  
CLERK

CASE NUMBER: 10-MJ-094  
10-MG-002

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 the year January 01, 2010 in McKinley county, in the District of New Mexico defendant(s), **registered members of the Navajo Nation Indian Tribe, within the exterior boundaries of the Navajo Indian Reservation, assaulted Christopher Cornelius Kenneth, with two dangerous weapons, to wit: a baseball bat and broom handle; the assault resulted in serious bodily injury; and defendants aided and abetted,** in violation of Title 18 United States Code, Section(s) 1153, 113 (a)3, 113 (a) 6 and 2(a).

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

**See Attached Affidavit hereby incorporated by reference as if fully restated herein.**

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

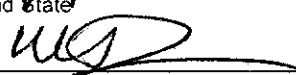
  
\_\_\_\_\_  
Signature of Complainant  
**SA David D. Cordova**  
**Special Agent**  
**Federal Bureau of Investigation**

**AUSA - PT**  
Sworn to before me and subscribed in my presence,

1/12/2010  
\_\_\_\_\_  
Date

at Gallegos, N.M.  
\_\_\_\_\_  
City and State

Robert W. Tonta  
\_\_\_\_\_  
Name & Title of Judicial Officer  
US Magistrate - Judge

  
\_\_\_\_\_  
Signature of Judicial Officer

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IN THE UNITED STATES DISTRICT COURT

FOR THE

DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA )

vs. )

VINSON SIX, Jr., YOB:1978 )  
NELVIN RAY WILLIE, YOB:1985)

10-MJ-094  
10-MG-001

AFFIDAVIT

The undersigned being duly sworn, deposes and says:

1) I, David D. Cordova, am a Special Agent of the Federal Bureau of Investigation (FBI), currently assigned to the Albuquerque Division, Gallup Resident Agency. I have been so employed since April 2008. I have a total of approximately nine (9) years of federal law enforcement experience. I have primary investigative responsibility in crimes that occur in Indian Country including violent crimes such as homicide, robbery, arson, aggravated assault, and sexual assault. The information set forth is known to me as a result of my own investigation or has been communicated to me by other law enforcement officers:

2) This affidavit has been made in support of an criminal complaint and application for an arrest warrant for Vinson Six Jr., and Nelvin Ray Willie, both registered members of the Navajo Nation Indian Tribe. This arrest warrant is to be conducted in connection with the assault of

1 Christopher Cornelius Kenneth (a registered member of the  
2 Navajo Nation Indian Tribe), in violation of Title 18, United  
3 States Code, Section(s) 1153, 113(a)(3), 113(a)(6) and 2(a);  
4 assault with a dangerous weapon; assault resulting in serious  
5 bodily injury; and aiding and abetting. The assault occurred  
6 within the exterior boundaries of the Navajo Nation Indian  
7 Reservation in Indian Country.

8  
9 3) In the early morning of January 01, 2010, two  
10 individuals, identified as Vinson Six Jr., and Nelvin Ray  
11 Willie assaulted Christopher Cornelius Kenneth at his  
12 residence located in Smith Lake, New Mexico. Nelvin Ray  
13 Willie, Viola James-Willie, Vinson Six Jr., and Andreanna  
14 Martinez drove to Christopher Cornelius Kenneth's residence  
15 in a blue Titan extended-cab pickup truck intending to  
16 assault Christopher Cornelius Kenneth. Nelvin Ray Willie, the  
17 driver of the pickup truck, drove onto the driveway and to  
18 the back of the Christopher Cornelius Kenneth's residence  
19 where he parked near the backside of the residence facing the  
20 street.

21  
22 4) Upon arrival at Christopher Cornelius Kenneth's  
23 residence, the back door to the house was open and  
24 Christopher Cornelius Kenneth was standing on the back step.  
25 Vinson Six Jr., approached Christopher Cornelius Kenneth and  
26 an argument broke out between the men. The argument led to a  
27 physical confrontation in the snow covered backyard. Nelvin  
28 Ray Willie, Viola James-Willie and Andreanna Martinez

1 interjected themselves in an attempt to stop the physical  
2 confrontation. During at this stage of the confrontation,  
3 Nelvin Ray Willie's eyeglasses were broken; Christopher  
4 Cornelius Kenneth's T-shirt was torn and pulled-off; Viola  
5 James-Willie was struck in the face.

6  
7 5) Fearing for his life, Christopher Cornelius  
8 Kenneth ran from his residence to Quanah Henry's residence,  
9 who lives next door. Christopher Cornelius Kenneth knocked on  
10 the door, but it went unanswered. No one was present at the  
11 residence. Vinson Six Jr., immediately followed Christopher  
12 Cornelius Kenneth to Quanah Henry's residence. Nelvin Ray  
13 Willie followed behind. The assault of Christopher Cornelius  
14 Kenneth continued at Quanah Henry's residence, except now  
15 both Vison Six Jr., and Nelvin Ray Willie possessed weapons  
16 in hand.

17  
18 6) According to Nelvin Ray Willie, Vinson Six Jr.,  
19 possessed an aluminum broom handle, 3 to 4 feet in length,  
20 and he (Nelvin Ray Willie) possessed an aluminum baseball  
21 bat, which Andreanna Martinez handed over to him. When Nelvin  
22 Ray Willie arrived at Quanah Henry's residence, he observed  
23 Christopher Cornelius Kenneth was backed up against the front  
24 door of the residence, leaning on it, facing the street and  
25 in a squatting position. Nelvin Ray Willie observed Vinson  
26 Six Jr., repeatedly strike Christopher Cornelius Kenneth with  
27 the broom handle. As a result, the glass to the screen door  
28 of the residence was broken. Nelvin Ray Willie then struck

1 Christopher Cornelius Kenneth on his arms with the baseball  
2 bat. Throughout the assault Christopher Cornelius Kenneth was  
3 screaming. Nelvin Ray Willie later led investigators to the  
4 baseball bat used during the assault.

5  
6 7) After the assault, both Vinson Six Jr., and  
7 Nelvin Ray Willie ran from the scene and back to Nelvin Ray  
8 Willie's pickup truck which was at Christopher Cornelius  
9 Kenneth's residence. The two men along with Andreanna  
10 Martinez entered the vehicle, now, driven by Viola James-  
11 Willie. The vehicle drove off, leaving a shirtless,  
12 disoriented, and injured Christopher Cornelius Kenneth at the  
13 scene alone, without help.

14  
15 8) Christopher Cornelius Kenneth walked to another  
16 residence several houses down, knocked on the door and asked  
17 for help. The individuals inside the residence provided  
18 first-aid to Christopher Cornelius Kenneth. Christopher  
19 Cornelius Kenneth was transported to the Crownpoint Indian  
20 Health Services (CIHS), Crownpoint, New Mexico, where he  
21 received treatment for his injuries. Navajo Nation Department  
22 of Law Enforcement (NNDLE) was subsequently notified of the  
23 incident.

24  
25 9) According to CIHS medical personnel, Christopher  
26 Cornelius Kenneth sustained the following injuries: four (4)  
27 inch laceration to the top of the head requiring fifteen (15)  
28 sutures; a fractured left forearm; a contusion on the right

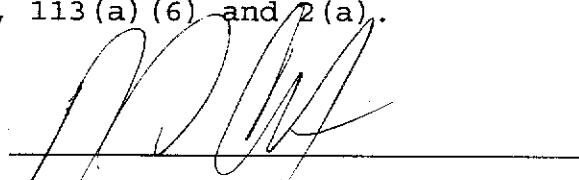
1 arm near the elbow; a fractured top front tooth, later  
2 removed by medical personnel; and abrasions and bruises to  
3 both knees among other minor injuries. Medical personnel also  
4 found small pieces of charred glass sitting on top of the  
5 skin on Christopher Cornelius Kenneth's backside.

6  
7 10) Christopher Cornelius Kenneth provided a  
8 statement in which he stated both Vinson Six Jr., and Nelvin  
9 Ray Willie assaulted him. During the assault, Christopher  
10 Cornelius Kenneth fled from his residence in an attempt to  
11 obtain help from his neighbors. Christopher Cornelius Kenneth  
12 stated he thought he was going to "die" when he was being  
13 assaulted. Later, Christopher Cornelius Kenneth informed  
14 investigators he was missing a baseball bat and a blue broom  
15 handle from the washing room located near the back door of  
16 his residence.

17  
18 11) On January 07, 2010, after two previous failed  
19 attempts to locate, Vinson Six Jr., and Andreanna Martinez,  
20 they were interviewed at their residence in Smith Lake, New  
21 Mexico where they provided voluntary statements. Vinson Six  
22 Jr., admitted to assaulting Christopher Cornelius Kenneth,  
23 but denied using the broom handle. Andreanna Martinez denied  
24 providing Nelvin Ray Willie the baseball bat. Investigators  
25 later located and seized a blue broom handle, approximately  
26 3' 4" in length, behind the residence of Clarence Martinez  
27 Sr., Andreanna Martinez's grandfather. Vinson Six Jr., and  
28 Andreanna Martinez also live at this residence. The broom

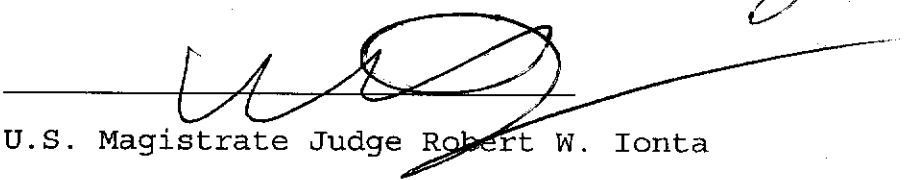
1 handle had a white plastic tip and contained red stains on  
2 and near the white tip.

3  
4 12) Based on the training, experience of the  
5 affiant, and information set forth in this affidavit, your  
6 affiant submits that there is probable cause to believe that  
7 on January 01, 2010, within the exterior boundaries of the  
8 Navajo Nation Indian Reservation in Indian Country, in the  
9 county of McKinley, in the State and District of New Mexico,  
10 Vinson Six Jr., and Nelvin Ray Willie, registered members of  
11 the Navajo Nation Indian Tribe, did assault Christopher  
12 Cornelius Kenneth with two dangerous weapons, to wit: a  
13 baseball bat and a blue broom handle; the assault resulted in  
14 serious bodily injury; and the defendants aided and abetted  
15 in violation of 18 United States Code, Section(s) 1153,  
16 113(a)(3), 113(a)(6) and 2(a).

17  
18 

19 David D. Cordova  
20 Special Agent  
21 Federal Bureau of Investigation  
22 Gallup, New Mexico

23 Subscribed and sworn to before me this 12 day of Jan  
24 2010.

25   
26 U.S. Magistrate Judge Robert W. Ionta