

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

1		
2	UNITED STATES OF AMERICA)
3)
4	VS.)
5	RAYMOND MARTIN)
6	Year of birth: 1948)
7	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.

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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.

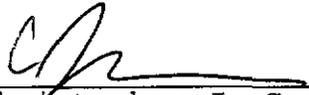
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17 4. On April 2, 2010, Raymond Martin, year of birth 1948,
18 social security account number XXX-XX-7231 was located at his
19 residence in Mesita Village, Laguna Pueblo, and interviewed by
20 FBI SA Christopher J. Geiger and FBI SA Anthony J. Costanza.
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.

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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).

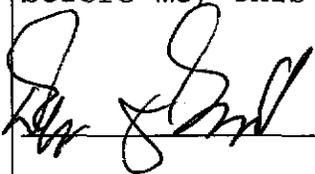
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I swear that this information is true and correct to
be best of my knowledge.



Christopher J. Geiger
Special Agent,
Federal Bureau of Investigation

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



UNITED STATES MAGISTRATE,
Albuquerque, NM

Reviewed and approved by SAUSA Charles Barth