

**FILED**  
UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

FEB - 1 2011

**United States District Court**  
IN THE DISTRICT OF NEW MEXICO

**MATTHEW J. DYKMAN**  
CLERK

UNITED STATES OF AMERICA

v.

**CRIMINAL COMPLAINT**

**SEBASTIANO COHO**  
YOB: 1990

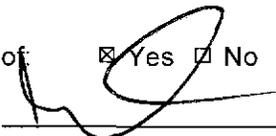
CASE NUMBER: 11-MJ-208  
11-MG-009

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 January 25, 2011, in Cibola County, in the District of New Mexico, defendant(s) did commit Aggravated Sexual Abuse, and knowingly cause another person to engage in contact between the penis and the vulva by using force against that other person, in violation of Title 18 United States Code, Section(s): 1153, 2241(a), and 2246(2)(A). Sebastiano Coho and Jane Doe are each registered members of the Navajo Nation. The aforementioned criminal act occurred within the exterior boundaries of the Navajo Indian Reservation, or Indian Country.

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

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

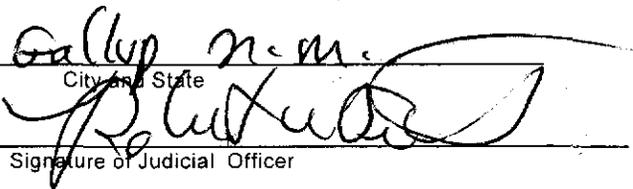
Continued on the attached sheet and made a part hereof:  Yes  No



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

**SA Matthew W. Collar**  
Special Agent  
Federal Bureau of Investigation

  
Date

at   
City and State  
Signature of Judicial Officer

**Robert W. Ionta, United States Magistrate Judge**  
Name & Title of Judicial Officer

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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA	)	CASE NO. <u>11-MJ-208</u>
	)	<u>11-MG-009</u>
VS.	)	
	)	
SEBASTIANO COHO	)	AFFIDAVIT IN SUPPORT OF
YOB: 1990	)	ARREST WARRANT

AFFIDAVIT

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

1. Your affiant is a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and has been employed in that capacity since January of 2008. Your affiant was previously employed by the Montana Highway Patrol and Bozeman Police Department since 1998. Your affiant is currently assigned to the Albuquerque Division of the FBI, Gallup Resident Agency, and has primary investigative responsibility for crimes occurring within Indian Country; including violent crimes such as homicide, robbery, arson, aggravated assault, and sexual assault. The information set forth in this affidavit has been derived from investigation conducted by your affiant, and/or communicated to me by other sworn Law Enforcement Officers.

2. Your affiant is aware that on January 25, 2011, Navajo-Ramah Police Department (NRPD) received a complaint of attempted rape occurring within the exterior boundaries of the

1 Navajo Nation near Pine Hill, New Mexico.

2  
3 (a) Jane Doe (19) reported having been both sexually  
4 and physically assaulted while consuming alcohol with classmate  
5 Sebastiano Coho in a wooded-area south of the Pine Hill Market.

6  
7 (b) Doe described Coho striking her in the face and  
8 head with his fists and forcibly removing her pants and panties  
9 while straddling her mid-section and touching her vagina with  
10 his hand.

11  
12 3. Your affiant is aware that Sebastiano Coho was  
13 subsequently arrested by the Ramah-Navajo Police Department for  
14 violation of Navajo Nation Tribal Code (NTC) Title 17 Section  
15 316 -- Battery.

16  
17 4. On January 27, 2011, your affiant contacted Coho  
18 while in the custody of the Ramah Detention Facility. Coho was  
19 advised of his rights per *Miranda* and agreed to participate in  
20 a digitally recorded interview without the presence of legal  
21 representation. Coho provided the following information:

22  
23 (a) Coho described having sexually and physically  
24 assaulted Jane Doe while consuming alcohol in a wooded area  
25 near the Pine Hill Market, located in Pine Hill, New Mexico.

26  
27 (b) Coho acknowledged becoming irretrievably aroused  
28 while "making-out" with Doe, and striking her in the face and

1 head with his right hand prior to "forcing" his penis into her  
2 vagina.

3  
4 (c) Coho described having had sexual intercourse  
5 with Doe despite her physical efforts to push him off and her  
6 verbal pleas for him to discontinue -- "[Doe] told me to stop  
7 but I wanted to finish."

8  
9 (d) Coho described having only had sexual  
10 intercourse with minor children prior to Doe, and further  
11 suggested the continued probability of his "losing control"  
12 remained high without the application of "sex and anger"  
13 treatment.

14  
15 5. Your affiant is aware that Sebastiano Coho and  
16 Jane Doe have each been identified as enrolled members of the  
17 Navajo Nation, and that the location of the offense has been  
18 determined to be within the exterior boundaries of the Navajo  
19 Indian Reservation, or Indian Country.

20  
21 6. Based on the information set forth in this  
22 affidavit, your affiant submits that there is probable cause to  
23 believe that Sebastiano Coho did commit Aggravated Sexual  
24 Abuse, and knowingly cause another person to engage in contact  
25 between the penis and the vulva by using force against that  
26 other person, in violation of Title 18 United States Code  
27 Section(s): 1153, 2241(a), and 2246(2)(A).

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7. I swear that this information is true and correct  
to the best of my knowledge and belief.



Matthew W. Collar  
Special Agent  
Federal Bureau of Investigation  
Gallup, New Mexico

Subscribed and sworn to before me  
this 1<sup>st</sup> day of February, 2011.



Robert W. Ionta  
United States Magistrate Judge