



IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

1 UNITED STATES OF AMERICA )  
2 )  
3 VS. )  
4 )  
5 JONATHAN GALLEGOS )  
6 Year of birth: 1992 )  
7 SSAN: XXX-XX-5595 )  
8 )  
9 and )  
10 )  
11 CHRISTIAN TRANCOSA )  
12 Year of birth: 1987 )  
13 SSAN: XXX-XX-3592 )

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 for  
approximately fourteen years. I am currently assigned to the  
Albuquerque Division and have primary investigative  
responsibilities in violent and other major crimes 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 September 13, 2010, the FBI and Bureau of Indian  
Affairs (BIA) initiated an investigation regarding the armed  
robbery of Manuel Montoya. Montoya is an enrolled member of the  
Sandia Indian Tribe and Tribal Council member. Jonathan

1 Gallegos and Christian Trancosa were identified as the robbers.  
2 Gallegos is not an enrolled member of a Native American Tribe.  
3 Trancosa is an enrolled member of the San Felipe Pueblo. The  
4 alleged robbery occurred on September 13, 2010, at Montoya's  
5 residence, on the Sandia Pueblo.

6  
7 3. Trancosa identified himself as the boyfriend of Alisha  
8 Moquino. Moquino attends Independence High School in Rio  
9 Rancho, New Mexico with Gallegos. On the afternoon of September  
10 13, 2010, Trancosa and Moquino went to Gallegos' residence,  
11 where they smoked marijuana and drank liquor.

12  
13 4. Between 7:00 and 8:00 p.m., Trancosa, Gallegos, and  
14 Moquino took Gallegos' car to a gas station for gasoline and  
15 oil. At the gas station, Trancosa asked Gallegos if he was  
16 interested in a "job," explaining that he knew of person on  
17 Sandia Pueblo that they could rob of a significant amount of  
18 money. Trancosa advised interviewing agents that his mother  
19 used to be a caretaker for Montoya. Trancosa's mother often  
20 spoke of her work with Montoya and inadvertently related to  
21 Trancosa that Montoya kept large amounts of money inside a safe  
22 within his house. Trancosa stated that he had considered  
23 robbing Montoya before and had discussed it with Moquino. At  
24 that time Moquino did not want to participate.

25  
26 5. Gallegos agreed to assist Trancosa with the robbery  
27 and they drove to San Felipe Pueblo, where Trancosa borrowed a  
28 rifle from a cousin. They then drove back to Rio Rancho and

1 went to an unknown residence, where Gallegos borrowed a rifle  
2 from an unidentified individual.

3  
4 6. Trancosa directed Moquino to drive them to the Sandia  
5 Pueblo, where she dropped Trancosa and Gallegos off just outside  
6 Montoya's residence. Trancosa directed Moquino to drive around  
7 the Pueblo for about ten minutes, then return to pick up  
8 Trancosa and Gallegos at the drop-off location. Trancosa and  
9 Gallegos took their rifles and walked a short distance to  
10 Montoya's residence. They entered the residence through an  
11 unlocked door and, moving from room to room, pointed rifles at  
12 various occupants of the residence, and demanding to know from  
13 each individual where the safe was located within the residence.

14  
15 7. Gallegos entered the room of Twila Montoya and David  
16 Urquidez and demanded the location of the safe. Urquidez  
17 grabbed Gallegos' rifle and the two of them began to struggle.  
18 During this struggle the rifle was fired, though it is unknown  
19 which individual caused the discharge. Alerted by the sound of  
20 the gunshot, Trancosa entered Twila Montoya's room, pointed his  
21 rifle at Urquidez's head and commanded him to get down on the  
22 floor. Using tape provided to him by Trancosa, Gallegos bound  
23 Urquidez's hands behind his back.

24  
25 8. Trancosa exited this room and entered the room of  
26 Manuel Montoya. He pointed the rifle at Montoya's head and  
27 demanded to know the location of the safe. Montoya told  
28 Trancosa that the safe was located on his dresser, but implored

1 Transcosa not to take the money. Trancosa took the safe and he  
2 and Gallegos fled from Montoya's residence. Trancosa and  
3 Gallegos did not observe Moquino waiting at the arranged pick-up  
4 location. Concerned about a growing police presence in the  
5 area, they left the scene in different directions.

6  
7 9. Based on the information set forth in this affidavit,  
8 your affiant submits that there is probable cause to believe  
9 that the night of September 13, 2010, Jonathan Gallegos, year of  
10 birth 1992, Social Security Account Number XXX-XX- 5595, an  
11 adult male, did take from Manuel Montoya, an adult male and  
12 enrolled member of the Sandia Indian Tribe, by force and  
13 violence, a safe containing approximately \$38,000, that the  
14 robbery occurred in the state and district of New Mexico and  
15 within Indian Country, in violation of Title 18, United States  
16 Code, Sections 1152 and 2111.

17  
18 10. Based on the information set forth in this affidavit,  
19 your affiant submits that there is probable cause to believe  
20 that the night of September 13, 2010, Christian Trancosa, year  
21 of birth 1987, Social Security Account Number XXX-XX-3592, an  
22 adult male and enrolled member of the San Felipe Pueblo, did  
23 take from Manuel Montoya, an adult male and enrolled member of  
24 the Sandia Indian Tribe, by force and violence, a safe  
25 containing approximately \$38,000, and that the robbery occurred  
26 in the state and district of New Mexico and within Indian  
27 Country, in violation of Title 18, United States Code, Sections  
28 1153 and 2111.

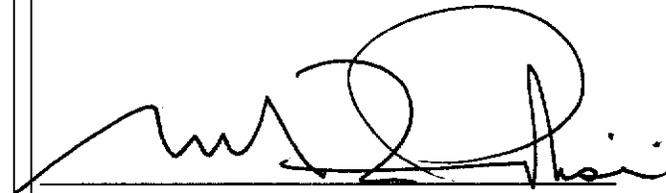
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I swear that this information is true and correct to  
be best of my knowledge.



BENEDICT B. BOURGEOIS  
Special Agent  
Federal Bureau of Investigation  
Albuquerque, New Mexico

Subscribed and sworn to  
before me, this 14<sup>th</sup> day of September, 2010.



U.S. Magistrate Judge

Reviewed and approved by AUSA Kyle Nayback