

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the
District of New MexicoUnited States of America
v.
THURMAN CURLEY (YOB 1989)

Case No.

25mj482

Defendant(s)

FILED
United States District Court
Albuquerque, New Mexico
Mitchell R. Elfers
Clerk of Court

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 17, 2025 in the county of McKinley in the
District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. § 1111	Murder;
18 U.S.C. § 1153	Crimes Committed within Indian Country;

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.


Complainant's signature

Stacey Stout, FBI Special Agent

Printed name and title

Telephonically sworn and electronically signed.

Date: 03/18/2025


Judge's signature

City and state: Albuquerque, New Mexico

Steven Yarbrough, United States Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

v.

THURMAN CURLEY
year of birth 1989.

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

I, Stacey Stout, a Special Agent (“SA”) with the Federal Bureau of Investigation (“FBI”), United States Department of Justice (“USDOJ”), being duly sworn, do depose and hereby state the following:

1. I make this affidavit in support of an application for a criminal complaint for a probable cause arrest related to the following violations:

- a. **18 U.S.C. § 1111** – *Murder*; and
- b. **18 U.S.C. § 1153** – *Major Crimes Act*.

AGENT BACKGROUND

2. I have been a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice, since September of 2019. As such, I am a “federal law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2510(7), and I am empowered by law to conduct investigations and to make arrests for offenses enumerated in 18 U.S.C. § 2516.

3. I am currently assigned to the Violent Crime/Violent Crimes Against Children squad of the FBI Albuquerque Field Office. During my employment with the FBI, I have conducted/participated in numerous investigations of suspected violations of Federal law, including Indian Country crimes and crimes of violence. I have received training on how to

conduct complex investigations and I have participated in the execution of arrest and search warrants involving various Federal violations. My investigative training and experience include, but is not limited to, conducting surveillance, interviewing subjects, targets and witnesses, writing affidavits for and executing search and arrest warrants, managing confidential human sources (“CHS”) and cooperating witnesses/defendants, issuing subpoenas, collecting evidence, and analyzing public records.

4. The information set forth in this affidavit is based upon my personal knowledge, and upon information reported to me by other law enforcement officers during the course of their official duties, all of who I believe to be truthful and reliable. Throughout this affidavit, reference will be made to law enforcement officers. The law enforcement officers are those who have directly participated in this investigation, and with whom your affiant has had contact regarding this investigation. This affidavit is also based upon information gained from interviews with cooperating victims and witnesses, whose reliability is established separately herein.

5. Based on my training, experience, and the facts set forth in this affidavit, I believe there is probable cause that a violation of United States Code Title 18 § 1111 – Murder and United States Code Title 18 § 1153 – Offenses Committed within Indian Country was committed by Thurman Curley (YOB 1989).

PROBABLE CAUSE

6. On March 17, 2025, at approximately 1:25 a.m., a subject identified as Thurman CURLEY (“CURLEY”), year of birth 1989, shot T.C., year of birth 1992, hereinafter referred to as JOHN DOE, causing his death at rural address, 112A, CR 7900, Pueblo Pintado, New Mexico which is located on the Navajo Reservation, Indian Country.

7. Upon information and belief, JOHN DOE is a member of the Navajo Nation, a federally recognized tribe. Upon information and belief, CURLEY is a member of the Navajo Nation, a federally recognized tribe.

8. On March 17, 2025, at approximately 1:25 a.m., Navajo Nation Police Department (NNPD) Officer Garret Thomas received a call involving a shooting incident that occurred at rural address, 112A, CR 7900, Pueblo Pintado, New Mexico. Officer Thomas arrived at the scene approximately 40 minutes later and began executing life-saving measures on JOHN DOE, who was unresponsive inside of the residence.

9. An Emergency Medical Response Team (EMT) responded and attempted life-saving measures on JOHN DOE. EMTs were unable to revive JOHN DOE and he died.

10. At approximately 2:30a.m. NNPD Criminal Investigator (CI) Ben Yazzie called the Albuquerque FBI Field Office for assistance. SA Thomas Long and SA Stacey Stout responded to assist.

11. NNPD CI Yazzie, SA Long, and SA Stout arrived at rural address, 112A, CR 7900, Pueblo Pintado, New Mexico at approximately 5:30a.m. Upon arrival, NNPD Officer Thomas informed CI Yazzie and FBI Agents that CURLEY was being held in a NNPD marked unit and CURLEY was refusing to speak to Officers. NNPD Officer Thomas stated that CURLEY was inebriated, and FBI Agents decided it would not be beneficial to speak to CURLEY and would interview CURLEY at a later time.

12. FBI Agents collected one (1) Glock 17 9mm handgun bearing serial number BVBP882 that was located on the ground outside of the residence, which NNPD Officer Thomas stated was used by CURLEY to shoot JOHN DOE. Additionally, FBI Agents collected one (1) expended 9 mm shell casing from underneath JOHN DOE'S body inside the residence.

13. Agents conducted an interview with WITNESS 1, who was present at the incident. WITNESS 1 indicated at approximately 8:30 p.m., CURLEY and JOHN DOE, who are brothers, began hanging out and drinking alcohol at 112A, CR 7900, Pueblo Pintado, New Mexico. WITNESS 1 indicated that CURLEY and JOHN DOE had not seen each other in approximately three (3) months, and they just wanted to spend time together. WITNESS 1 went to sleep and woke up at approximately midnight or 1:00a.m. when they heard CURLEY and JOHN DOE physically fighting each other. WITNESS 1 heard JOHN DOE accusing CURLEY of sending messages to JOHN DOE'S girlfriend, to which CURLEY denied. JOHN DOE was hitting CURLEY repeatedly and WITNESS 1 heard JOHN DOE yell at CURLEY, "I'm going to kill you!" WITNESS 1 then stated that he/she was afraid and ran outside to get help for CURLEY. WITNESS 1 did not hear a gun shot and was not aware that CURLEY had a firearm with him. WITNESS 1 stated CURLEY was sitting on the ground outside and kept saying "Sorry" when they came back to the residence after looking for help.

14. WITNESS 1 did not know CURLEY to be violent and said CURLEY was "always nice."

15. Agents conducted an interview with WITNESS 2, who was present at the scene of the incident. WITNESS 2 stated that CURLEY and his girlfriend showed up yesterday (March 16, 2025), and came and went all day from 112A, CR 7900, Pueblo Pintado, New Mexico. WITNESS 2 did not know if CURLEY and JOHN DOE were drinking. Later that night, CURLEY's girlfriend came to WITNESS 2's door and stated JOHN DOE and CURLEY were fighting and CURLEY's girlfriend was told to go inform JOHN DOE and CURELY's parents, who lived next door. WITNESS 2 heard a gunshot as they were getting dressed to go outside. WITNESS 2 went outside and saw CURLEY walking around outside with a gun in his hand. WITNESS 2 told CURLEY to

put the gun down and CURLEY complied. WITNESS 2 stated that CURLEY then said, "I shot my brother."

16. WITNESS 2 then entered the residence at 112A, CR 7900, Pueblo Pintado, New Mexico, tried helping JOHN DOE, and directed someone to call 911. WITNESS 2 directed others to stay away until police arrived.

17. WITNESS 2 stated that JOHN DOE and CURLEY were always fighting. WITNESS 2 also stated that CURLEY would threaten JOHN DOE with a gun and that CURLEY always has his gun on him.

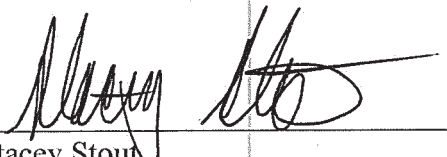
CONCLUSION

18. Based on the foregoing information, there is probable cause to believe CURLEY committed violations of **18 U.S.C. §§ 1153 and 1111, *Murder in Indian Country***, when he shot JOHN DOE with a pistol causing his death.

19. Based upon the information contained in the above affidavit, I believe probable cause has been established to arrest CURLEY for the above indicated violations.

20. AUSA Elisa Dimas reviewed and approved this criminal complaint.

I swear the above information is true and correct to the best of my knowledge and belief.



Stacey Stout
Special Agent
Federal Bureau of Investigation

Electronically subscribed and telephonically sworn to before me this 18th day of March, 2025.



THE HONORABLE STEVEN YARBROUGH
UNITED STATES MAGISTRATE JUDGE