

UNITED STATES DISTRICT COURT

for the

District of New Mexico

United States District Court
Albuquerque, New MexicoMitchell R. Elfers
Clerk of Court

United States of America

v.

TERROLD TYLER

Year of birth: 1989

Case No.

25mj995

Defendant(s)

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 April 29, 2025 in the county of San Juan in theDistrict of New Mexico, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1153

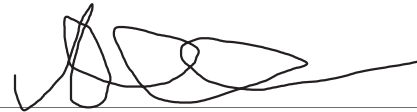
Offenses committed within Indian Country

18 U.S.C. §§ 113(a)(3)

Assault with a Dangerous Weapon

This criminal complaint is based on these facts:

See attached affidavit, incorporated by reference, submitted by FBI SA Andrew Wright, and approved by SAUSA Elisa Dimas.

☒ Continued on the attached sheet.

Complainant's signature

Andrew Wright, Special Agent FBI

Printed name and title

Telephonically sworn and electronically signed.

Date: 04/30/2025

Judge's signature

City and state: Albuquerque, NM

Karen B. Molzen, U.S. Magistrate Judge

Printed name and title

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

UNITED STATES OF AMERICA

v.

TERROLD TYLER

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AFFIDAVIT IN SUPPORT OF
COMPLAINT

I, Andrew Wright, being duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”) and have been so employed since December 2020. I am currently assigned to the Albuquerque Field Office, Farmington Resident Agency. My primary duties as a Special Agent with the FBI include investigating crimes occurring in Indian Country which include primarily investigating violent crimes that involve murder, assault, and felon in possession. I am familiar with the investigation and prosecution of violent crimes occurring in Indian Country, including the use of warrants to search for evidence. I have gained experience in the conduct of such investigations through previous case investigations, formal training, and in consultation with law enforcement partners in local, state, tribal and federal law enforcement agencies. As a Federal Agent, I am authorized to investigate violations of the laws of the United States and have authority to execute arrest and search warrants issued under the authority of the United States.

2. This affidavit is based upon my personal knowledge, and upon information reported to me by other federal, state, tribal, and local law enforcement officers during the course of their official duties, all of whom I believe to be truthful and reliable.

Throughout this affidavit, reference will be made to law enforcement officers. Law enforcement officers are those federal, state, tribal, and local law enforcement officers who have directly participated in this investigation, and with whom your affiant has had regular contact regarding this investigation. This affidavit is also based upon information gained from interviews with victims, whose reliability is established separately herein.

3. This affidavit is being submitted in support of a criminal complaint charging Terrold Tyler (**TYLER**) with 18 U.S.C. §§ 1153 and 113(a)(3), that being Assault with a Dangerous Weapon in Indian Country.

PROBABLE CAUSE

4. On 4/29/2025, The Navajo Nation Police Department received a 911 call from a security guard with the Bashes' Dine' Grocery Store, US-64, Shiprock, New Mexico. The report made stated that an individual was shot in hand and was currently in front of the Little Caesars Restaurant, Shiprock, New Mexico. The complainant gave the description of the shooter as a male wearing a gray shirt, black pants, and white shoes.

5. Upon arrival, Navajo Nation Police Officer Andrew Wauneka observed an individual matching the description of the shooter walking westbound along the store front near Little Caesars. The suspect had a black 5.11 brand backpack with what appeared to be a metal pipe sticking out. The suspect noticeably observed Officer Wauneka and abruptly turned around and began walking eastbound. The suspect dropped the backpack in front of the Little Caesars Restaurant.

6. The suspect continued to walk away at which time he was stopped and detained by Officer Wauneka. Officer Wauneka retrieved the backpack and found that it contained

a homemade firearm and five live shotgun shells. Officer Wauneka identified the suspect as TYLER based on Officer Wauneka's prior interactions with TYLER as well as the suspect matching the booking photo used in a law enforcement alert seeking TYLER'S whereabouts. TYLER was questioned about the contents of the backpack. TYLER pointed at a male walking in the parking lot and stated that he was holding it for the other male.

7. Contact was made with the other male and was identified as D.B., year of birth 1992, (hereinafter refereed to as John Doe). John Doe told officers that he and TYLER were arguing by the Taco Bell earlier. John Doe decided that he wanted to leave and began walking away towards the Little Caesars. TYLER and a female followed John Doe. John Doe walked behind the restaurant where the argument continued. At some point TYLER pulled out the homemade shotgun and shot John Doe in the hand.

8. John Doe stated he was shot by TYLER and wounded on the left hand. Officers observed blood on John Doe's left hand which appeared to be drying. Officers also observed a small part of skin missing on John Doe's left forearm. The area of the forearm was not bleeding.

9. Paramedics responded to the location and attempted to evaluate John Doe. John Doe refused treatment.

10. Navajo Nation's Department of Criminal Investigations, Criminal Investigator Jefferson Joe obtained a copy of a Tiktok video posted by user "JalepenoSlim23" which depicts TYLER holding what appeared to be the same firearm found inside the backpack.

JURISDICTIONAL INFORMATION

11. The incident occurred on the Navajo Nation Reservation and took place within the exterior boundaries of the Navajo Indian Reservation.

12. John Doe as well as TYLER are enrolled members of the Navajo Nation and are Indians for purposes of federal law.

CONCLUSION

13. Based on the above information, I submit that there is probable cause to believe that TYLER violated 18 U.S.C. §§ 1153 and 113(a)(3), that being Assault with a Dangerous Weapon in Indian Country.

14. Therefore, I respectfully request that the Court approve the attached criminal complaints and issue arrest warrants.

15. This complaint was reviewed and approved by Supervisory Assistant United States Attorney Elisa Dimas.



Andrew Wright
Special Agent
Federal Bureau of Investigation

Subscribed to and telephonically sworn before me
this 30 day of April 2025



United States Magistrate Judge