

UNITED STATES DISTRICT COURT
for the
District of New Mexico

United States of America)
v.)
MATTHEW CHARLEY) Case No. MJ 25-1568 JFR
YEAR OF BIRTH 1995)
)
)
)
)

Defendant(s)



CRIMINAL COMPLAINT

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

Code Section

Offense Description

18 U.S.C. § 1153
18 U.S.C. §§ 113(a)(3) Offenses Committed within Indian Country
Assault with a Dangerous Weapon

This criminal complaint is based on these facts:

See attached affidavit, incorporated by reference, submitted by SA Jared Harshbarger and approved by AUSA Amy Mondragon.

Continued on the attached sheet.


John Zinken
Complainant's signature

SA Jared Harshbarger

Printed name and title

Sworn to before me and signed in my presence.

Date: 05/13/2025


John F. Ronhouse
Judge's signature

obenhaar, U.S. Mag

City and state: Albuquerque, NM

John F. Robbenhaar, 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.

MATTHEW CHARLEY,
YOB 1995

CASE NO. _____

AFFIDAVIT IN SUPPORT OF
COMPLAINT

I, Jared Harshbarger, 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 January 2021. 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 application is being submitted in support of a criminal complaint charging MATTHEW CHARLEY with 18 U.S.C. § 1153 and 18 U.S.C. §§ 113(a)(3) that being Assault with a Dangerous Weapon in Indian Country.

PROBABLE CAUSE

4. On April 19, 2025, following a 911 call at 9:17 PM, Navajo Police Department (NPD) responded to the approximate area along US-491, Shiprock, NM, south of Northern Navajo Medical Center (NNMC), in response to a report of a victim, John Doe, who had been stabbed three times. John Doe was identified to have three lacerations to his backside which included the left and right upper back, and lower right flank. John Doe and was taken to NNMC for emergency care.

5. On April 19, 2025, FBI Special Agent Jared Harshbarger and Navajo Nation Criminal Investigator Dean Goldtooth responded to the area. Upon responding, Witness 1 was located along US-491 and agreed to speak with law enforcement.

6. Witness 1 advised Agents that on April 19, 2025, he was with John Doe and Witness 2. The three of them were hanging out throughout the day and then ended up at “the Slab”, which is a concrete area near Witness 2's house. CHARLEY came up to them while they were all there at “the Slab”. Witness 1 recognized CHARLEY despite CHARLEY'S appearance being different due to what Witness 1 believed was the result of drug use. Witness 1 was acquainted with CHARLEY as he had gone to school with him. CHARLEY was showing off his knife that

appeared to be a switch blade. CHARLEY was hanging out with Witness 1, Witness 2, and John Doe for about 15-20 minutes. Witness 1 and Witness 2 then decided to go to “Dinos” (the gas station) down the road leaving CHARLEY and John Doe behind. Witness 1 explained, prior to the Witness 2 and him leaving for “Dinos”, CHARLEY and John Doe did have a small verbal altercation, but this did not involve any type of physical altercation so Witness 1 felt it was safe to leave them behind.

7. According to Witness 1, he and Witness 2 left to “Dinos” but then realized they forgot their card, so they went back to “the Slab.” When Witness 1 and Witness 2 arrived back at “the Slab”, they found John Doe had been stabbed. John Doe told Witness 1 and Witness 2 that CHARLEY stabbed him. John Doe told them his back was cold, so Witness 1 took a video of one of the stab wounds on John Doe’s back so John Doe could see it. Witness 1 then called 911 for help. On May 5, 2025, Witness 1 provided Agent with the video he recorded of John Doe, as described above. The video was retained within the case file for future retrieval purposes.

8. Witness 1 further provided that CHARLEY lives in the pink trailer behind Burger King in Shiprock, NM. Witness 1 stated that before the stabbing, CHARLEY told the three of them that he had an eight ball at his house, and he wanted to go smoke it. (Agent note: 3.5 grams is commonly known as an “eight ball” when referring to drugs), Witness 1 believed CHARLEY went home after the stabbing. Witness 1 stated he did not think John Doe personally knew CHARLEY.

9. Witness 1 identified “the Slab” was located east of the location where he was interviewed and near a white house; Witness 2’s house.

10. Following the interview of Witness 1, law enforcement traveled to the scene of the crime (“the Slab”) for further documentation, which was identified to be near GPS 36.791718, -108.687233.

11. As law enforcement arrived at “the Slab”, Witness 2 came out of the white house, which was identified to be where he was currently residing. Witness 2 advised that on April 19, 2025, Witness 2 was hanging out with John Doe and Witness 1 near Witness 2’s residence. They were at a concrete area near his residence, also known as “the Slab.” CHARLEY came to the area where they were hanging out and appeared to be on drugs. Witness 2 believed it to be methamphetamine. Witness 2 saw CHARLEY had a “small shank.” Witness 2 and Witness 1 went to “Dinos” and then returned to “the Slab.” Upon returning, Witness 2 saw that John Doe was stabbed and CHARLEY was gone. John Doe told Witness 2 and Witness 1 that CHARLEY and him had “got into it.” Witness 2 and Witness 1 then walked John Doe down to the highway where Witness 1 called 911. Witness 2 further explained CHARLEY was wearing “all black” and lived behind Burger King in the red residence. Witness 2 explained CHARLEY was known to use narcotics and prior to the stabbing CHARLEY admitted to the group that he had an “eight ball” of methamphetamine as his house.

12. John Doe was interviewed by Agents on April 30, 2025, at his residence. John Doe advised on April 19, 2025, John Doe was hanging out with Witness 1 and one of his friends (Witness 2). The three of them were dropped off by Witness 1's girlfriend at the incident location, which was near Witness 2's house near a concrete area (“the Slab”). Another male individual, CHARLEY, came up to where they were and introduced himself, but John Doe couldn't remember his name. John Doe did not know CHARLEY; John Doe had never met him before. CHARLEY appeared to be “on something, and his eyes were bulging”. Witness 1 and Witness 2 left the area and went to go buy cigarettes at “Dinos” and John Doe decided he would stay at “the Slab” with CHARLEY and wait for Witness 1 and Witness 2. Once John Doe saw Witness 1 and Witness 2 in the distance coming back from “Dinos”, John Doe started to leave

“the Slab”. As John Doe turned to leave, he was stabbed by CHARLEY and John Doe felt a sharp pain in his back and shoulder. John Doe explained he did not know whether CHARLEY stabbed him with a “knife or a box cutter or something”. John Doe asked CHARLEY “Did you just stab me?”. CHARLEY ran away after the stabbing. John Doe did not provoke CHARLEY and there was no altercation between the two prior to CHARLEY stabbing him. John Doe then ran down the hill and met up with his two friends. John Doe told them that he thought CHARLEY stabbed him. The two friends helped him, and Witness 1 called 911.

13. John Doe further stated CHARLEY was wearing a black and white pullover (possibly a Raiders pullover) with jeans. John Doe further described CHARLEY was skinny, had a buzz cut and was wearing a black and white ball cap. John Doe also stated CHARLEY was around the same height as John Doe, 5’9.

14. On April 25, 2025, SA Harshbarger received surveillance video for Burger King, Shiprock, from the third-party company who manages the systems, DTiQ. During the review of the security footage, it was observed on April 19, 2025, at 6:16:55 PM (prior to the stabbing), an individual matching the description of CHARLEY departed the TARGET PREMISES. The individual was wearing what appears to be a pull over sweater, jeans, a hat, a black mask, and black and white shoes. The clothing matched the description provided by John Doe. The individual was observed to walk through the Burger King parking lot, towards US-64 (in the direction of “the Slab”). Below is a screenshot from referenced Burger King video.



15. A review of CHARLEY'S criminal history revealed assault with intent to murder, along with various tribal charges such as domestic disputes, hit and run, battery of a family member, etc.

16. Based on the information provided from Witness 1 and Witness 2, I drove to the Burger King in Shiprock, New Mexico and I did see a pink residence as described. Of note, there is only one Burger King in Shiprock, New Mexico. Upon further review, I have determined the GPS coordinates for this residence are 36.778313, -108.694640. Below is a picture of this residence that I photographed.



JURISDICTIONAL STATEMENT

17. Upon information and belief, and according to the NPD, the scene of the crime (“the Slab”) is located at 36.791718, -108.687233 and is within the community of Shiprock, which is entirely within the exterior boundaries of the Navajo Nation, in the State and District of New Mexico, and is Indian Country for purposes of federal law.

18. CHARLEY and John Doe are enrolled members of the Navajo Nation and are Indians for purposes of federal law.

CONCLUSION

19. Based upon the above information contained herein, your affiant believes that there is probable cause that CHARLEY violated, 18 U.S.C. § 1153 and 18 U.S.C. §§ 113(a)(3) that being Assault with a Dangerous Weapon in Indian Country.

20. Therefore, I respectfully request that the Court approve the attached criminal complaint and issue an arrest warrant.

21. This complaint was reviewed and approved by Assistant United States Attorney Amy Mondragon.



Jared Harshbarger
Special Agent
Federal Bureau of Investigation

Subscribed to and electronically sworn before me this 13th day of May 2025:



John F. Robbenhaar
United States Magistrate Judge
John F. Robbenhaar