

UNITED STATES DISTRICT COURT

for the
District of New MexicoUnited States of America
v.ARMONDO PAUL
(YOB 2000)*Defendant(s)*

Case No. MJ 25-2599 KBM

FILEDUnited States District Court
Albuquerque, New MexicoMitchell 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 June 27, 2025 in the county of San Juan in the
 District of New Mexico, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 1153(a)

Crimes occurring in Indian Country

18 U.S.C. § 1111(a)

Second-degree murder

This criminal complaint is based on these facts:

See attached Affidavit, attested to by FBI SA Jared Harshbarger and reviewed and approved by AUSA Zach Jones.

☒ Continued on the attached sheet.*Complainant's signature*

FBI SA Jared Harshbarger

Printed name and title

Sworn to before me and signed in my presence.

Date: 06/28/2025*Judge's signature*City and state: Albuquerque, New Mexico

Honorable Karen 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

Plaintiff,

vs.

ARMONDO PAUL,

Defendant.

Case No. _____

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Jared Harshbarger, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I have been employed with the FBI since January 2021. As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, I am a government agent with statutory arrest authority charged with conducting criminal investigations of alleged violations of federal criminal statutes, including Title 18 of the United States Code. I am presently assigned to the Farmington Resident Agency, Albuquerque Division, where my duties include investigating violations of Federal law, specifically those violations occurring on the Navajo Nation Indian Reservation.

2. I have received training and gained experience in the investigation and enforcement of major crimes including murder, firearms offenses, and other federal crimes. Additionally, I have received training and experience in interview techniques, arrest procedures, search-warrant applications, the execution of searches and seizures, and

various other criminal laws and procedures. I have previously participated in investigations within Indian Country involving the crime of murder.

3. The facts in this Affidavit come from my personal observations, my training and experience, and information obtained from other agents, law-enforcement officers, and witnesses. Because this Affidavit is submitted for the limited purpose of securing a criminal complaint, I have not included every fact known to me concerning the investigation. I have set forth only those facts that I believe are necessary to establish that probable cause to support a criminal complaint as explained below.

4. This affidavit is being submitted in support of a criminal complaint charging Armondo Paul (PAUL) (YOB 2000) with Murder in the Second Degree in Indian Country pursuant to 18 U.S.C. §§ 1153 and 1111.

RELEVANT STATUTES

5. 18 U.S.C. § 1153(a), in relevant part, states:

Any Indian who commits against the person or property of another Indian or other person any of the following offenses, namely, murder...shall be subject to the same law and penalties as all other persons committing any of the above offenses, within the exclusive jurisdiction of the United States.

6. 18 U.S.C. § 1111(a) states:

Murder is the unlawful killing of a human being with malice aforethought. Every murder perpetrated by poison, lying in wait, or any other kind of willful, deliberate, malicious, and premeditated killing; or committed in the perpetration of, or attempt to perpetrate, any arson, escape, murder, kidnapping, treason, espionage, sabotage, aggravated sexual abuse or sexual abuse, child abuse, burglary, or robbery; or perpetrated as part of a pattern or practice of assault or torture against a child or children; or perpetrated from a premeditated design unlawfully and maliciously to effect the death

of any human being other than him who is killed, is murder in the first degree. Any other murder is murder in the second degree.

PROBABLE CAUSE

Introduction & Initial Investigation

7. At 3:14 a.m. on June 27, 2025, Navajo Nation Police Department (NPD) responded to a stabbing in Shiprock, New Mexico. NPD officers arrived at a residence in Shiprock (GPS coordinates 36.76634, -108.70302), where they found a man (JOHN DOE) on the ground with facial wounds. Emergency services were dispatched to provide life-saving aid to DOE. When first responders arrived, they saw DOE had a laceration to his neck. This laceration was consistent with trauma inflicted by a sharp-edged object. OMI pronounced DOE dead at the scene.

8. NPD secured the scene and contacted the Navajo Nation Department of Criminal Investigations and the FBI to join the investigation.

9. Responding NPD officers searched the area around DOE. They found blood pools on the driveway, on the entry way to the residence, and spread throughout the house leading to the rear door. Officers interviewed witnesses that day.

10. After conducting an initial investigation, police learned **PAUL** killed DOE at the home of his ex-girlfriend (C.N.) by breaking into C.N.'s home and stabbing DOE in the neck. JOHN DOE is C.N.'s father. C.N. and DOE resided together. **PAUL** did not reside with C.N. or DOE.

11. M.J. is a male next-door neighbor to C.N. and DOE. S.H. is a female next-door neighbor who resides with M.J. S.H. and M.J. are boyfriend and girlfriend. Summaries of their police interviews are below.

12. **PAUL** was not apprehended at the scene. Rather, **PAUL** fled the scene and was arrested on the evening of June 28, 2025. A summary of his police interview is immediately below.

Interview of Armondo PAUL

13. After his arrest on June 28, 2025, **PAUL** agree to a recorded custodial interview with Affiant. During that interview, **PAUL** said the following:

14. On June 26, 2025, **PAUL** got home from work. Around 10:00 p.m., **PAUL** went to C.N.'s residence. Upon arrival, **PAUL** knocked on the window. He saw DOE looking through the window from inside the residence; DOE acknowledged **PAUL**. DOE then went to C.N.'s room and told C.N. that **PAUL** was outside. **PAUL** heard C.N. say she did not want to see **PAUL**.

15. After about 10 to 15 minutes of **PAUL** waiting outside, C.N. exited. C.N. told **PAUL** to get into her vehicle. In the car, C.N. and **PAUL** talked. C.N. dropped **PAUL** off at his house and told him to go to sleep. **PAUL** attempted to sleep but was fighting his internal feelings. **PAUL**'s feelings ranged from wanting to destroy something to wanting to kill himself. As **PAUL** was battling these feelings, he decided to walk back to C.N.'s residence in the early hours of June 27, 2025.

16. On June 27, 2025, **PAUL** brought a kitchen knife (approximately 8 to 11 inches long) with him to C.N.'s home, which he intended to use to harm himself. **PAUL** sat outside C.N.'s residence, rubbing the knife against himself, until he decided to get C.N.'s attention.

17. **PAUL** decided to shut off the power to elicit a response. After doing so, C.N. exited the home being a “bitch.” DOE attempted to calm **PAUL** down.

18. DOE and C.N. went back inside the residence, standing at the rear door. C.N. closed the door on **PAUL**. **PAUL** felt rage; he thus kicked the door, which knocked back DOE and C.N. **PAUL** entered the residence and grabbed C.N.’s arm. DOE grabbed **PAUL** to pull him off C.N. **PAUL** grabbed DOE. As **PAUL** held DOE with his right hand, he reached into his pocket with his left hand, retrieved a knife, and stabbed DOE in the neck.

19. DOE fell backwards and pulled the knife out of his own neck. DOE walked out the door and collapsed in the driveway. **PAUL** tried to follow DOE out, but C.N. held **PAUL**’s leg. **PAUL** freed himself by kicking C.N. in the face. Once **PAUL** was free, he went outside to check on DOE, who was laying in the driveway with blood spewing out of his neck. DOE was making gurgling sounds.

20. At this point, **PAUL** went to C.N.’s bedroom and kicked in her door. C.N. had a baby in the room with her; **PAUL** saw the baby was startled, so he went back outside.

21. A next-door neighbor (M.J.) arrived and asked what happened to DOE. M.J. told **PAUL** to stay and wait for police.

22. A short while later, after C.N. saw DOE was dead, C.N. went to get her child from the house. **PAUL** told her the child was in the back room. Both **PAUL** and C.N. went into the back room. **PAUL** had a second knife, which he found in the kitchen. **PAUL** sat on C.N.’s bed and announced he was going to kill himself because he was a monster

and he deserved it; DOE was dead, and C.N. had every right to be mad at him. C.N. tried to wrestle the knife from **PAUL**.

23. Affiant clarified with **PAUL** the two separate knives referenced above. **PAUL** brought Knife 1 from his residence. Knife 1 was the knife he used to stab DOE. After stabbing DOE, **PAUL** lost Knife 1 because it was lodged in DOE's neck. After **PAUL** saw DOE dying in the driveway, **PAUL** searched for Knife 1 in the home. **PAUL** found Knife 1 within the interior of the house, on the stovetop. **PAUL** kept Knife 1 in his jacket pocket until discarding it when he fled from police. During this interview, **PAUL** advised law enforcement of the general location where he discarded Knife 1 and offered to show law enforcement where he left it. **PAUL** found Knife 2 in C.N.'s kitchen. **PAUL** found Knife 2 following DOE's killing. **PAUL** retained Knife 2 as he fled the scene. NPD recovered Knife 2 when **PAUL** was detained.

24. When **PAUL** saw an ambulance arrive, he fled to avoid arrest. **PAUL** discarded the knife he used to stab DOE while he fled.

Interview of C.N.

25. Investigators also interviewed C.N. (DOE's daughter and **PAUL**'s ex-girlfriend). She said that on June 26, 2025, around 11 p.m., **PAUL** came to her residence. She told DOE not to answer the door, but DOE already waved at **PAUL**. C.N. thus went the door; **PAUL** said he wanted to talk. C.N. did not want **PAUL** causing problems. C.N. thus got **PAUL** into her car and drove **PAUL** to his mother's residence. **PAUL** pulled out a white knife. She took that knife and tossed it out. C.N. tried to calm **PAUL** down. After

arrival at PAUL'S residence, C.N. told PAUL to go inside and go to sleep. C.N. left the residence and drove back home.

26. Around 2:00 a.m. on June 27, 2025, C.N.'s dog barked, which signaled to her that someone was outside. She got up to investigate. As C.N. stood in the hallway, the lights went out. C.N. knew PAUL was outside because he is the only person who does things like this. In the past, PAUL has turned her power off, turned her water heater off, slashed her tires, and broken her windshield on her vehicle.¹

27. DOE went outside to check the electrical box. C.N. found PAUL leaning against the side of the house, as if he was hiding. PAUL said he could not sleep. C.N. was cold and went inside to get sweatpants and a sweater.

28. Because of PAUL's history of irrational and violent behavior, C.N. has a lock on her bedroom. Her son was sleeping in the room, and she locked the door behind her. C.N. was then in the hallway, with the backdoor open. C.N. called PAUL's mother via Facebook Messenger, as usually PAUL's mother or father will come and get PAUL. PAUL's mother did not answer. C.N. also tried to TikTok message PAUL's sister for assistance, as C.N.'s phone was not working.

29. C.N. heard DOE say, "Goodnight Mondo" (Mondo is PAUL's nickname). C.N. went to the kitchen, into which the back door leads. PAUL was outside of the door. C.N. slammed the door in PAUL's face. As soon as she closed the door, PAUL kicked the door, which caused the door to hit her. PAUL came inside and punched her in the face.

¹ Agents observed a car with a broken windshield in C.N.'s driveway.

30. DOE grabbed **PAUL**. **PAUL** shoved DOE's face into a cabinet. C.N. then grabbed **PAUL**'s shirt. C.N. could hear DOE saying "Ow." C.N. did not see **PAUL** stab DOE.

31. DOE then ran into the living room, towards the front door. C.N. was screaming "call the cops" because DOE was the only one with a phone. C.N. was holding **PAUL**; **PAUL** started dragging her, since **PAUL** was trying to get DOE.

32. At this point, C.N. was on the ground, screaming and holding **PAUL**'s legs by the refrigerator. **PAUL** kicked C.N. in her face; she let go.

33. After being kicked in the face, C.N. ran out the back door. C.N. ran next door and banged on her neighbor's window. She asked her neighbor (S.H.) to open the door. S.H. and her boyfriend (M.J.) opened their front door. C.N. told them what happened; S.H. called police.

34. M.J. went back to C.N.'s residence with C.N. They saw DOE laying in the driveway behind a car. DOE was dead.

35. C.N. went to get her son. C.N. walked down the hallway and found her door kicked in by **PAUL**.

36. **PAUL** was in C.N.'s room with C.N.'s son. **PAUL** was sitting on the edge of the bed with two knives (a blue one and a red one). **PAUL** said he was going to kill them all. C.N. asked **PAUL** not to hurt them. C.N. tried to take the knives from **PAUL**. C.N. tried to get her son to go to S.H. **PAUL** was also trying to hurt himself, by pointing the knife at himself. C.N. got the blue knife from **PAUL**, which she put in her pocket. C.N.

tried to get the red knife, but **PAUL** stood up. They walked down the hallway, with **PAUL** following C.N. out of the room. M.J. asked **PAUL** not to leave, but **PAUL** left.

37. **PAUL** and C.N. used to date. **PAUL** has “always been abusive.” **PAUL** hit her, cornered her, took her phone, and broke things. When C.N. tried to leave the relationship, he would react violently. **PAUL** would not take “no” as an answer. C.N. used to have friends stay over because she was so scared of **PAUL**. **PAUL** has previously strangled C.N., thrown her on the ground, thrown things at her, and hit her. C.N.’s son and DOE have previously pulled **PAUL** off C.N. while **PAUL** abused her.

38. At the time this occurred, C.N. was thinking of obtaining a restraining order against **PAUL**. However, things were quiet with **PAUL**, so C.N. thought the restraining order was not needed.

Interview of M.J.

39. Investigators also interviewed M.J., the next-door neighbor.

40. On June 27, 2025, C.N. came to M.J.’s residence and banged on the window. C.N. said **PAUL** beat up her father (DOE).

41. **PAUL** was in C.N.’s driveway, attempting to get in her vehicle. **PAUL** was in black pants, black jacket, no hat, and wore glasses.

42. C.N. went back to her residence to check on her child. M.J. went to DOE, who was laying in the driveway. DOE was barely breathing and making snoring or gurgling sounds. A puddle of blood was forming. M.J. asked **PAUL** what he did. **PAUL** said he was sorry and loved DOE.

43. C.N. entered her home to get her child; **PAUL** followed. M.J. stood by the front door for C.N.'s safety. M.J. could hear C.N. telling **PAUL** to give her the knives. **PAUL** went out of the house to the front and then went back in. While **PAUL** was outside, he paced back and forth with a knife with a three-to-four inch red handle and an approximately five-inch blade. C.N. attempted to retrieve the knife from **PAUL** but **PAUL** held the knife by his chest and said, "I earned this," and put it in his jacket pocket. **PAUL** kept repeating he loved DOE and did not mean to do it.

44. **PAUL** fled the residence once NPD got close.

45. C.N. said **PAUL** was abusive to her and routinely assaulted her during their relationship. M.J. observed bruises from the abuse on C.N.

Interview of S.H.

46. Investigators interviewed S.H., a next-door neighbor who resided with M.J.

47. On June 27, 2025, S.H. heard C.N. banging on her doors and windows. C.N. said DOE was bleeding. She said **PAUL** beat up her father and pushed him against an electric box in the rear of the residence.

48. C.N. advised that earlier in the day, **PAUL** came over, but C.N. tried not to let **PAUL** in. C.N. drove **PAUL** back home. **PAUL** then walked back to C.N.'s residence. **PAUL** got into a fight with DOE at the rear of the residence.

49. S.H. previously worked with **PAUL** at Kentucky Fried Chicken. S.H. knew **PAUL**'s mood could shift from happy to anger. **PAUL** was in a relationship with C.N.; they began dating about one year ago.

50. C.N. said **PAUL** abused her on a regular basis, which began about two months into the relationship. C.N. said **PAUL** would kick, punch, drag, and strangle her. S.H. observed C.N. with a busted lip and bruises on her body.

JURISDICTIONAL STATEMENT

51. Upon information and belief, and according to the NPD, the scene of the crime is located at 36.76634, -108.70302. This is within 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.

52. Records state that **PAUL** and JOHN DOE are all enrolled members of the Navajo Nation and are Indians for purposes of federal law.

CONCLUSION

53. Based on the above information, I submit there is probable cause to believe **PAUL** violated federal law by committing the offense of Murder in the Second Degree in violation of 18 U.S.C. §§ 1153 and 1111.

54. I respectfully request the Court approve the attached criminal complaint and issue and arrest warrant.

12. On June 28, 2025, Assistant United States Attorney Zach Jones reviewed and approved this complaint.



Jared Harshbarger
Special Agent
Federal Bureau of Investigation

Subscribed to and sworn before me
this 28th day of June, 2025.

A handwritten signature in black ink, reading "Karen B. Molzen", is written over a horizontal line.

Honorable Karen B. Molzen
United States Magistrate Judge