

UNITED STATES DISTRICT COURT  
for the  
District of New Mexico

United States of America )  
v. )  
SULLIVAN JAKE JR, YOB 2000; ) Case No. 26-MJ-51 LF  
BRAXTON JAKE, YOB 2007; )  
JUANILLO LEE JAKE, YOB 2002; )  
 )  
 )

FILED  
United States District Court  
Albuquerque, New Mexico

---

Mitchell R. Elfers  
Clerk of Court

*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 January 04, 2026 in the county of Cibola in the  
District of New Mexico, the defendant(s) violated:

## *Code Section*

### *Offense Description*

18 U.S.C. §§ 1153, 1111, and 2	second degree murder
18 U.S.C. §§ 1153, 113(a)(3), and 2	assault with a dangerous weapon, and
18 U.S.C. §§ 1153, 113(a)(6), and 2	assault resulting in serious bodily injury

This criminal complaint is based on these facts:

See attached affidavit, incorporated by reference, submitted by SA Michael Dalpini and approved by Supervisory AUSA Jack Burkhead

Continued on the attached sheet.

Michael Dalpini  
Complainant's signature

Michael Dalpini, Special Agent FBI

*Printed name and title*

Sworn to before me by telephone or other reliable electronic means.

Date: January 5, 2026

*Laura Oshig*  
Judge's signature

City and state: **Albuquerque, NM**

**Laura Fashing, United States Magistrate Judge**

*Printed name and title*

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

UNITED STATES OF AMERICA,  
Plaintiff,

v.

**SULLIVAN JAKE JR. (YOB 2000),  
BRAXTON JAKE, (YOB 2007), and  
JUANILLO JAKE, YOB 2002,  
Defendants.**

CASE NO. 26-MJ-51 LF

AFFIDAVIT IN SUPPORT OF  
COMPLAINT AND ARREST WARRANT

I, Michael Dalpini, being duly sworn, state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. This affidavit is made in support of a Criminal Complaint for SULLIVAN JAKE JR. (hereinafter referred to as SULLIVAN; YOB 2000), BRAXTON JAKE (hereinafter referred to as BRAXTON; YOB 2007), and JUANILLO JAKE (hereinafter referred to as JUANILLO; YOB 2002) charging each with 18 U.S.C. §§ 1153, 1111, and 2, that being second degree murder and aiding and abetting, and 18 U.S.C. §§ 1153, 113(a)(3), and 2, that being assault with a dangerous weapon and aiding and abetting, and 18 U.S.C. §§ 1153, 113(a)(6), and 2, that being assault resulting in serious bodily injury and aiding and abetting.

2. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed since July 2022. I am currently assigned to the Albuquerque Field Office, Gallup Resident Agency. My primary duties as a Special Agent with the FBI in Gallup, New Mexico include investigating crimes occurring in Indian Country, which include homicide, assault, sexual assault, crimes against children, kidnapping, and bank robbery, among other federal violations. I have 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 criminal complaints and search warrants issued under the authority of the United States.

3. This affidavit is based upon my personal knowledge, as well as information reported to me by other federal, state, tribal, and local law enforcement officers during the course of their official duties. 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. This affidavit is also based upon information gained from interviews with cooperating witnesses, whose reliability is established separately herein.

4. Based on my training, experience, and the facts set forth in this affidavit, I believe there is probable cause that SULLIVAN, BRAXTON, and JUANILLO violated 18 U.S.C. §§ 1153, 1111, and 2, that being second degree murder, and 18 U.S.C. §§ 1153, 113(a)(3), and 2, that being assault with a dangerous weapon, and 18 U.S.C. §§ 1153, 113(a)(6), and 2, that being assault resulting in serious bodily injury. Because this affidavit is submitted for the limited purpose of securing authorization for the proposed warrant, I have not included each and every fact known to me concerning this investigation. This affidavit is intended to show that there is sufficient probable cause for the requested complaint.

#### **PROBABLE CAUSE**

5. On January 05, 2026, at approximately 12:22 AM, the FBI Albuquerque, Gallup Resident Agency (GRA), was notified by a Ramah-Navajo Criminal Investigator of an assault involving three (3) subjects, SULLIVAN, BRAXTON, and JUANILLO; and two (2) victims, EM (hereinafter referred to as JOHN DOE 1) and EM (hereinafter referred to as JOHN DOE 2) at

approximate GPS coordinates 34.90039, -108.40115 (hereinafter referred to as THE SCENE). JOHN DOE 1 was pronounced deceased at THE SCENE, and JOHN DOE 2 was transported to Gallup Indian Medical Center (GIMC) located in Gallup, NM.

6. Ramah-Navajo Police Department (RNPD) confirmed that THE SCENE falls within the exterior boundaries of the Ramah-Navajo Reservation, a federally recognized Indian Reservation.

7. THE SCENE consisted of a dirt driveway to a house located adjacent to THE SCENE.

8. On the same day, at approximately 1:25 AM, Agents interviewed JOHN DOE 2 at GIMC. JOHN DOE 2 stated that Sullivan Jake, Jr. (SULLIVAN) and his brothers attacked JOHN DOE 1 and 2.

9. According to hospital staff, JOHN DOE 2 sustained the following injuries: a broken arm, part of his ear was torn off, he had multiple injuries to his face and head, and he suffered bleeding in his brain.

10. On the same day, at approximately 2:22 AM, Agents arrived at THE SCENE and located the following individuals:

- JOHN DOE 1, who was deceased;
- HH (YOB 1993) (hereinafter referred to as WITNESS 1), who is a friend of John Doe 1;
- MM (YOB birth 2012) (hereinafter referred to as WITNESS 2), the 13-year-old son of JOHN DOE 1, and
- A.B. (hereinafter referred to as Witness 3) (YOB 1994), who is WITNESS 2's legal guardian.

Agents also discovered at THE SCENE several rocks and pieces of wood covered in a reddish substance consistent with blood.

11. On the same day, at approximately 2:38 AM, Agents interviewed WITNESS 1 at THE SCENE. WITNESS 1 provided the following information: WITNESS 1 was inside JOHN DOE 1's house, which sits approximately 10 yards from THE SCENE, prior to and during the assault and homicide. WITNESS 1 advised that a woman, only identified as a relative of the Jake family, came over and told JOHN DOE 1 that "Sullivan Jake Sr. and his boys were coming over." Your affiant is aware that the Sullivan Jake Sr.'s sons are the defendants: SULLIVAN, BRAXTON, and JUANILLO. Shortly afterward, WITNESS 1, who knew the Jake family, heard a vehicle known to be driven by the Jakes, approach the house. WITNESS 1 then heard yelling, loud noises, and four (4) gunshots. WITNESS 1 stated that WITNESS 2 witnessed the assault and homicide.

12. On the same day, at approximately 3:29 AM, Agents interviewed WITNESS 2 with his legal guardian, WITNESS 3. WITNESS 2 provided the following information. WITNESS 2 was at THE SCENE prior to and during the assault and homicide. WITNESS 2 observed John Doe 1 (i.e. his father) in the driveway when a small, light-blue truck approached JOHN DOE 1. When the vehicle stopped, SULLIVAN, BRAXTON and "Neo" jumped out of the car and all-together began beating JOHN DOE 1 with wooden sticks and metal poles (according to RNPD, "Neo" is a known nickname for JUANILLO). JOHN DOE 1 told WITNESS 2 to run inside the residence adjacent to THE SCENE and call JOHN DOE 2. WITNESS 2 observed JOHN DOE 2 come over and attempt to stop SULLIVAN, BRAXTON, and JUANILLO from leaving. That is when SULLIVAN, BRAXTON, and JUANILLO got back out of their truck and all-together began beating JOHN DOE 2 with wooden sticks and metal poles. SULLIVAN, BRAXTON, and

JUANILLO were at Sullivan Jake Sr's residence prior to the assault and homicide.

13. WITNESS 3 was present during the interview of WITNESS 2. WITNESS 3 provided the following additional information: JOHN DOE 1 used to date the sister of SULLIVAN, BRAXTON, and JUANILLO, C.M. On December 23, 2025, JOHN DOE 1 and C.M. broke up. WITNESS 3 believed the motive for the attack had to do with the fallout of the romantic relationship between JOHN DOE 1 and C.M.

14. According to RNPD, on the evening of January 04, 2026, prior to the assault and homicide, a neighbor of JOHN DOE 1, LB (YOB 1969) (hereinafter referred to as WITNESS 4) drove by JOHN DOE 1's residence and observed Sullivan Jake, Jr. (SULLIVAN) in the driver-seat of a blue-colored Nissan truck parked on the road near JOHN DOE 1's residence.

#### **JURISDICTIONAL STATEMENT**

15. Upon information and belief, and confirmed by RNPD, THE SCENE, located approximately at GPS coordinates 34.90039, -108.40115, Pinehill, NM, is entirely within the exterior boundaries of the Ramah-Navajo Reservation, in the State and District of New Mexico, and is Indian Country for purposes of federal law.

16. Information provided by RNPD indicate SULLIVAN, BRAXTON, JUANILLO, JOHN DOE 1 and JOHN DOE 2 are each enrolled members of the Ramah-Navajo Indian Tribe.

#### **CONCLUSION**

17. Based on the information set forth in this affidavit, I believe there is probable cause to believe that SULLIVAN, BRAXTON, and JUANILLO violated 18 U.S.C. §§ 1153, 1111, and 2, that being second degree murder, and 18 U.S.C. §§ 1153, 113(a)(3), and 2, that being assault with a dangerous weapon, and 18 U.S.C. §§ 1153, 113(a)(6), and 2, that being assault resulting in serious bodily injury. Therefore, I respectfully request that the Court approve the attached criminal

complaint and issue an arrest warrant.

18. Supervisory Assistant United States Attorney Jack Burkhead has reviewed and approved this complaint.

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

*Michael Dalpini*  
\_\_\_\_\_  
Michael Dalpini  
Special Agent  
Federal Bureau of Investigation

Subscribed to and electronically sworn before me this 5<sup>th</sup> day of January, 2026.

*Laura Fashing*  
\_\_\_\_\_  
LAURA FASHING  
UNITED STATES MAGISTRATE JUDGE