

FILED**UNITED STATES DISTRICT COURT**United States District Court
Albuquerque, New Mexicofor the
District of New MexicoMitchell R. Elfers
Clerk of CourtUnited States of America
v.

Case No.

26-MJ-226TAYLON KEESWOOD (YOB 2006)*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 01/21/2026 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 and 113(a)
(3)
18 U.S.C. § 924(c)(1)(A)(iii)Assault with a Dangerous Weapon in Indian Country
Discharging a Firearm During and in Relation to a Crime of Violence

This criminal complaint is based on these facts:

See Attached.

☒ Continued on the attached sheet.*Complainant's signature*Jared Harshbarger, Special Agent - FBI*Printed name and title*

- ☐ Sworn to before me and signed in my presence.
☒ Sworn to telephonically and signed electronically.

Date: January 23, 2026City and state: Albuquerque, New Mexico*Judge's signature*U.S. Magistrate Judge, STEVEN YARBROUGH*Printed name and title*

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, 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 (RA), 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, assaults, 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 crimes enumerated below.

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 Taylon KEESWOOD (**KEESWOOD**) (YOB 2006) with Assault with a Dangerous Weapon, in violation of 18 U.S.C. §§ 1153 and 113(a)(3), and Discharging a Firearm During and in Relation to a Crime of Violence, in violation of 18 U.S.C. § 924(c)(1)(A)(iii).

PROBABLE CAUSE

5. On Wednesday, January 21, 2026, at approximately 8:47 PM, Navajo Police Department (NPD), Shiprock Dispatch, received a call from Darel James (Reporting Party), that **KEESWOOD** was shooting someone's house on the southside, but Reporting Party was unaware of whose house. The Reporting Party advised that **KEESWOOD** was with Caleb Adams (ADAMS). NPD made contact with **KEESWOOD** and Cayden Keeswood (**CAYDEN**) near duplex 10 section of South Non-Profit-Housing and detained both individuals. Both individuals were then transported to NPD, Shiprock NM. Investigators responded to the scene where the shooting occurred, at South Non-Profit Housing, Shiprock NM, GPS 36.765206, -108.702698. Shell casings were collected at the scene. **VICTIM 1's** house was struck with gun fire numerous times in multiple areas of the residence. Four individuals were located within the residence at the time of the shooting.

VICTIM 1 INTERVIEW

6. On January 22, 2026, **VICTIM 1** was interviewed by Special Agent Jared Harshbarger with the FBI and Criminal Investigator Dean Goldtooth with Navajo Nation Department of Criminal Investigations.

7. On January 21, 2026, **VICTIM 1** was at her residence with three children under the age of 18. At approximately 8:30 PM, as **VICTIM 1** was dozing off, she heard a loud bang and gun shots. The firing got louder. **VICTIM 1** laid on the floor and yelled for the children to lay on the floor as well. The shooting lasted for a minute or two.

VICTIM 1 observed bullet holes in the walls in the bedroom and living room. **VICTIM 1** also observed bullet holes in the windows. **VICTIM 1** was unable to see anyone when she looked outside. **VICTIM 1** could hear individuals arguing down the road. **VICTIM 1**'s ears were ringing. In addition to the loud gun shots, **VICTIM 1** also heard high pitch noises. The gun fire sounded like a burst of around 15 rounds. **VICTIM 1** called her son on the telephone, John Doe 1, and advised him of the incident. John Doe 1 was at Fort Lewis College, Durango Colorado, during the incident. John Doe 1 contacted his friends in Shiprock and heard the shooting was by the **KEESWOODs**. **VICTIM 1** advised that no one in the house was struck by a bullet.

KEESWOOD INTERVIEW

8. On January 22, 2026, at approximately 2:31 AM, **KEESWOOD** was interviewed by Special Agent Jared Harshbarger with the FBI and Criminal Investigator Dean Goldtooth with Navajo Nation Department of Criminal Investigations.

KEESWOOD was advised of his *Miranda* right and consented to speaking with investigators.

9. On January 21, 2026, **KEESWOOD** left his home in Shiprock, NM with his mother, father, little brother and little brother's girlfriend to go pick up his check from McDonalds in Kirkland, NM. Following the retrieval of his check, **KEESWOOD** travelled to East Main Trade, located across from the Ford Dealership in Farmington, NM. **KEESWOOD** purchased ammunition which consisted of 100 rounds of 7.62 x 39 caliber for his Century Arms AK47, and 325 rounds of .22 caliber for his Smith and Weston .22 assault style rifle. Both firearms were purchased from East Main Trade about a month prior. The AK47 was purchased first and then about one week later **KEESWOOD** purchased the .22 rifle.

10. **KEESWOOD** returned home around 4:00 PM – 5:00 PM from being in Farmington. After returning home, **KEESWOOD** went to his sister, Sommer Valino's (SOMMER) house, located in South Non-Profit, house number 1016, Shiprock NM at GPS 36.767632, -108.702096. **KEESWOOD** took his AK47 and .22 rifle with him so he could show SOMMER the firearms since she had not seen them yet.

11. **KEESWOOD** drank two BeatBox alcoholic beverages during the day and then a small amount of a fifth of flavored vodka. The alcohol was consumed approximately some time before 6:00 PM – 7:00 PM, and **KEESWOOD** did not consume alcohol after that point.

12. **KEESWOOD** and SOMMER walked to ADAMS' house, located in Shiprock NM at GPS 36.752479, -108.697160, which was approximately a 20-minute walk. While **KEESWOOD** and SOMMER were at ADAMS's house, **KEESWOOD's** brother **CAYDEN** arrived as well. Sometime later, the four of them walked to

SOMMER's house. After leaving SOMMER's house, the group travelled back to ADAMS' house. On the way to ADAMS' house, **KEESWOOD** placed the AK47 at the baseball field, which was East of where the shooting occurred, behind the housing office in Shiprock, NM. **KEESWOOD** placed the AK47 in the baseball field because he did not want to be seen walking around with the firearm. After leaving ADAMS house, **KEESWOOD** retrieved the AK47 from the baseball field. **KEESWOOD** and **CAYDEN** then walked approximately two minutes to the South Non-Profit Housing area. **KEESWOOD** then took the AK47 into the A Ct neighborhood area of South Non-Profit Housing. **KEESWOOD** then fired the AK47 from his hip and shot all the rounds contained within his 30-round magazine. **KEESWOOD** fired the weapon at the house where John Doe 1 was known to reside. **KEESWOOD** attempted to shoot the vehicle that was at the front of the residence. After firing all the rounds within the magazine, **KEESWOOD** and **CAYDEN** fled the scene. Navajo Police Department responded to the scene and made contact with **CAYDEN** and **KEESWOOD**. In the area of where law enforcement contact was made, near duplex 10 section of South Non-Profit-Housing, was where **KEESWOOD** hid the AK47.

13. **KEESWOOD** and John Doe 1 previously went to Shiprock High school together in approximately 2024 - 2025. **KEESWOOD** and John Doe 1 had gotten into verbal altercations that included both of them making verbal threats. No physical altercation took place.

CAYDEN INTERVIEW

14. On January 22, 2026, at approximately 1:13 AM, **CAYDEN** was interviewed by Special Agent Jared Harshbarger with the FBI and Criminal Investigator Dean Goldtooth with Navajo Nation Department of Criminal Investigations. **CAYDEN** was advised of his *Miranda* right and consented to speaking with investigators.

15. On January 21, 2026, **CAYDEN** was kicked out of his house by his parents. **CAYDEN** went to his grandmother's house. **CAYDEN** stayed with his grandmother until around 3:00 PM and then he went to a friend's house on the North Side of Shiprock, NM. **CAYDEN** found out that his sister, SOMMER, and his brother, **KEESWOOD**, were going to ADAMS' house. Around 7:50 PM – 8:00 PM, **CAYDEN** decided to check up on SOMMER and **KEESWOOD**. **CAYDEN**'s grandmother took him to ADAMS' house around 8:30 PM – 8:40 PM. After approximately 15 – 25 minutes, ADAMS, **KEESWOOD**, SOMMER, and **CAYDEN** walked back to SOMMER's house. **CAYDEN** and **KEESWOOD** got into a fight and the group separated. **KEESWOOD** had a black, 7.62 caliber AK47, with a 30-round magazine, along with additional magazines in a camouflaged carrying case. ADAMS had the .22 assault style rifle that belonged to **KEESWOOD**.

16. **CAYDEN** was with SOMMER in the area of South-Non-Profit behind the housing office when he observed **KEESWOOD** walk into the South-Non-Profit housing area with the AK47. **CAYDEN** then heard the AK47 fire approximately 30 times. After the shots were fired, **CAYDEN** observed **KEESWOOD** and ADAMS run towards the double sections. **CAYDEN** and SOMMER met up with ADAMS and started going back

to ADAMS' house. **KEESWOOD** rejoined the group with the AK47 at a later point. SOMMER then split off from the group.

17. **KEESWOOD** and **CAYDEN** went back to ADAMS' house and looked for **KEESWOOD**'s .22, but ADAMS was not there. The two of them left ADAMS house and then were encountered by their parents who arrived in the area in a vehicle.

KEESWOOD and **CAYDEN** ran from their parents. Navajo Police Department arrived after that, and **KEESWOOD** fled and hid the AK47. **KEESWOOD** gave **CAYDEN** the magazine, which **CAYDEN** dropped near a rock pile when police arrived.

18. **CAYDEN** believed John Doe 1 lived at the house shot by **KEESWOOD**. **CAYDEN** was unsure why **KEESWOOD** shot at the house. **CAYDEN** was aware of disagreements between **CAYDEN** and John Doe 1 back from high school that involved threats that they would shoot each other.

19. **KEESWOOD** had a green ammunition can at his residence which contained ammunition.

THE FIREARM

20. Law enforcement located the firearm at GPS 36.767154, -108.712446. Firearm recovery location was in the exact location where **KEESWOOD** identified. The firearm was a Century Arms 7.62 x 39, VSKA.

21. Based on my training and experience, I know that a Century Arms 7.62 x 39, VSKA is a firearm as that term is defined in 18 U.S.C. § 921(a)(3).

JURISDICTIONAL STATEMENT

22. According to the NPD, the scene of the crime is located near South-Non-Profit Housing, Shiprock NM (GPS 36.765206, -108.702698), which is entirely within the exterior boundaries of the Navajo Nation Indian Reservation, in the State and District of New Mexico, and is Indian Country for purposes of federal law.

23. According to Certificate of Indian Blood and admissions during interview, **KEESWOOD** is an enrolled member of Navajo Nation and is an Indian for purposes of federal law.

CONCLUSION

24. Based on the above information, I submit that there is probable cause to believe that **KEESWOOD** violated federal law by committing the offense of Assault with a dangerous weapon in Indian Country pursuant to 18 U.S.C. §§ 1153 and 113(a)(3), and Discharge of a Firearm During and in Relation to a Crime of Violence, in violation of 18 U.S.C. § 924(c)(1)(A)(iii).

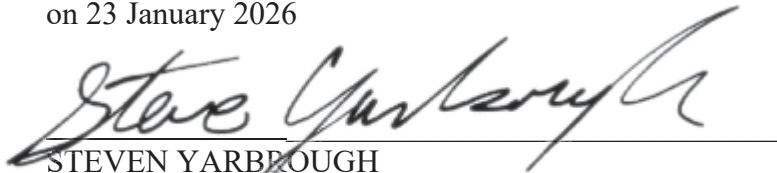
25. Therefore, I respectfully request that the Court approve the attached criminal complaint and issue arrest warrant.

12. This complaint was reviewed and approved by Supervisory Assistant United States Attorney Jack Burkhead.


Jared Harshbarger

Special Agent
Federal Bureau of Investigation

Sworn to before me by telephone or other reliable electronic means
on 23 January 2026



STEVEN YARBROUGH
United States Magistrate Judge