

EIGHTH JUDICIAL DISTRICT COURT  
COUNTY OF TAOS  
STATE OF NEW MEXICO

PRESIDING JUDGE: SARAH C. BACKUS / JEFF McELROY / EMILIO CHAVEZ

NO. D-820-CR-201800 167

STATE OF NEW MEXICO,  
Plaintiff,

vs.

SIRAJ IBN WAHHAJ

DOB: 06/21/1978

SSN: 105-80-0214

ADDRESS: 1659 Beecher Street SW, Atlanta, GA 30310  
Defendant.

BERNARDE P. STRUCK  
CLERK OF THE  
DISTRICT COURT

2018 AUG 28 AM 10:30

FILED IN MY OFFICE  
EIGHTH JUDICIAL DIST. COURT  
TAOS COUNTY, NM 071

Crime(s): Abuse of a Child (Does Not Result in Death or Great Bodily Harm) (6562)  
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Abuse of a Child (Does Not Result in Death or Great Bodily Harm) (6562)  
Custodial Interference (Right to Custody) (0131)

### CRIMINAL COMPLAINT

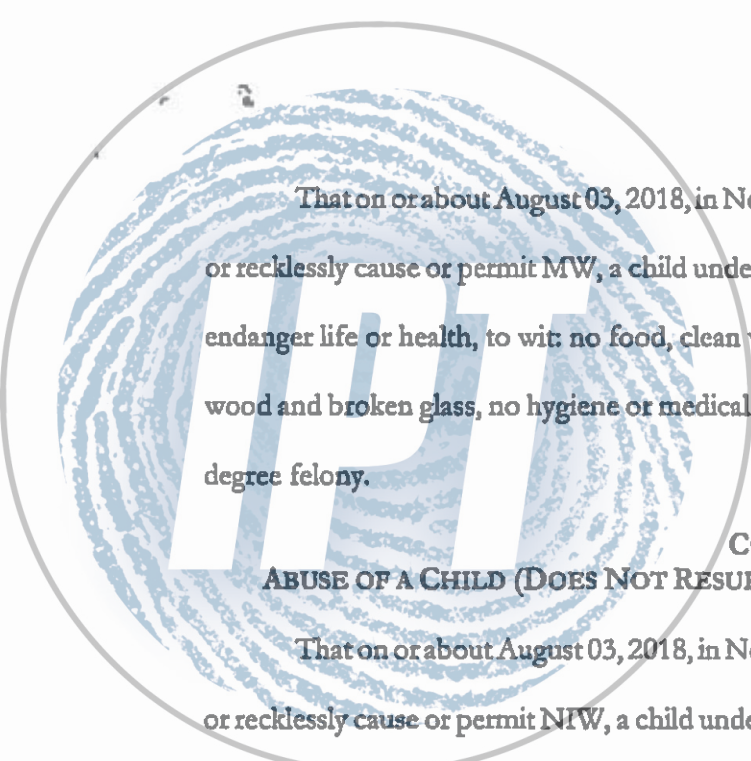
#### COUNT 1:

**ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit OW, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

#### COUNT 2:

**ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**



That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit MW, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 3:  
ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit NW, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 4:  
ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit NW, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 5:  
ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit JL, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.



**COUNT 6:  
ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit FL, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 7:  
ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit NA, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 8:  
ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit AM-8, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 9:  
ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit AM-6, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions,

hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 10:**

**ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit AM-4, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 11:**

**ABUSE OF A CHILD (DOES NOT RESULT IN DEATH OR GREAT BODILY HARM) (6562)**

That on or about August 03, 2018, in New Mexico, the above-named defendant did intentionally or recklessly cause or permit AM-2, a child under the age of eighteen, to be placed in a situation that may endanger life or health, to wit: no food, clean water, leaking propane gas, filthy conditions, hazardous wood and broken glass, no hygiene or medical care, contrary to NMSA 1978 §30-6-1(D)(2009), a third degree felony.

**COUNT 12:**

**CUSTODIAL INTERFERENCE (RIGHT TO CUSTODY) (0131)**

That on or between December 10, 2017 and August 3, 2018, in New Mexico, the above-named defendant, a person with a right to custody of AGW, did maliciously take/detain/conceal/entice away/fail to return, a child under the age of eighteen years, without good cause and with the intent to permanently or for a protracted time Deprive Hakima Ramzi of her right to custody of the child, contrary to NMSA 1978 §30-4-1(B) (1989), a fourth degree felony.

I swear or affirm under penalty of perjury that the facts set forth above are true to the best of my information and belief. I understand that it is a criminal offense subject to the penalty of



imprisonment to make a false statement in a criminal complaint.



**IPT**


/egv



Sheriff Jerry Hogrefe  
Taos County Sheriff's Department  
Complainant

RESPECTFULLY SUBMITTED,  
DONALD GALLEGOS  
DISTRICT ATTORNEY

BY: \_\_\_\_\_



Timothy R. Hasson  
Deputy District Attorney  
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575.758.8683