



**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

In the Matter of the Extradition of

Case No.: 1:19-mj-018-DJS

RAYMOND DONLON

COMPLAINT
(18 U.S.C. § 3184)

I, the undersigned Assistant United States Attorney, being duly sworn, state on information and belief that the following is true and correct:

1. In this matter, I represent the United States in fulfilling its treaty obligation to Ireland.

2. There is an extradition treaty in force between the United States and Ireland, the Treaty on Extradition Between the United States of America and Ireland, U.S.-Ir., July 13, 1983, T.I.A.S. No. 10813 (the "1983 Treaty"), and the Instrument as contemplated by Article 3(2) of the Agreement on Extradition between the United States of America and the European Union signed 25 June 2003, as to the application of the Treaty on Extradition between the United States of America and Ireland (the "Instrument"). The Annex to the Instrument reflects the applicable integrated text of the provisions of the 1983 treaty, and the U.S.-E.U. Extradition Agreement (hereinafter collectively referred to as the "Treaty").

Request for Extradition from Ireland

3. Pursuant to the Treaty, the government of Ireland has submitted a formal request through diplomatic channels for the extradition of Raymond Donlon ("DONLON") from the

United States to Ireland.

4. Tom Heinemann, an Assistant Legal Adviser in the Office of the Legal Adviser for the U.S. Department of State, has provided the U.S. Department of Justice with a declaration authenticating a copy of the diplomatic notes by which the request for extradition of DONLON was made and a copy of the Treaty, stating that the offenses for which extradition is demanded are provided for by the Treaty, and confirming that the documents supporting the request for extradition bear the certificate or seal of Ireland's Department of Foreign Affairs and Trade, in accordance with Article VIII (7) of the Treaty, so as to enable them to be received into evidence.

5. The declaration from the U.S. Department of State with its attachments, including a copy of the diplomatic notes from Ireland, a copy of the Treaty, and the certified documents submitted in support of the request, are filed with this complaint and incorporated by reference herein. *See* Exhibit 1.

Summary of the Extradition Request

6. According to the information provided by the government of Ireland, DONLON is currently charged with 394 criminal counts arising from his protracted sexual abuse of two minor victims, TK and CM, between 2004 and 2009, who DONLON came into contact with through his involvement as a former coach, sports photographer, and office administrator at the Pearse Park sporting ground in Longford, Ireland.

7. Specifically, DONLON is charged with 210 counts of Sexual Assault, 177 counts of Rape, 1 count of Attempted Rape, 3 counts of Assault Causing Harm, 1 count of False Imprisonment, 1 count of Damage to Property, and 1 count of Harassment in violation of the following: Section 2 of the Criminal Law (Rape) (Amendment) Act 1990, as amended by Section 37 of the Sex Offenders Act 2001; Rape under Section 4 – Contrary to Section 4 of the

Criminal Law (Rape) (Amendment) Act 1990; Section 3, Section 10, and Section 15 of the Non-Fatal Offences Against the Person Act 1997; and Section 2 of the Criminal Damage Act 1991.

8. These offenses were committed within the jurisdiction of Ireland. Warrants for DONLON's arrest were issued on September 26, 2017, by the Judge of the District Court, at Longford, Ireland. The warrants were issued on the basis of the following facts:

Raymond DONLON and the Pearse Park Sporting Ground

9. Between 2004 and 2009, DONLON was well-known within the small local community in which the offenses occurred, and in particular within the local sporting community. Pearse Park, the locus of many of the alleged offenses, is a sports ground and small stadium owned by the Gaelic Athletic Association (GAA) in Longford, Ireland. The GAA is a community-based, volunteer-led organization with members of all ages participating in team sports, such as hurling and gaelic football. DONLON had significant involvement in the local GAA scene. DONLON coached underage teams and also assisted as a photographer and office administrator at Pearse Park.

Victim CM

10. Minor victim CM was involved in odd jobs around Pearse Park, assisting the caretaker. CM knew DONLON from DONLON's administrative work at Pearse Park, as there is only one office in the complex. In November of 2012, CM, by then no longer a minor, disclosed to law enforcement that DONLON had sexually abused him over a period of time between 2005 and 2009 when CM was between the ages of 11 and 16. Much of the abuse occurred at Pearse Park. The abuse consisted of DONLON forcing CM to touch DONLON's erect penis and masturbate DONLON.

Victim TK

11. The investigation into the allegations against minor victim CM revealed another minor victim, TK, who had also been sexually abused by DONLON. DONLON coached, and groomed, victim TK from the age of at least 12, giving him a job, gifts, money and trips away from a difficult home life. DONLON's treatment of TK devolved into isolation, sexual assault and physical abuse. DONLON is accused of sexually abusing TK for a lengthy period of time, between 2004 and 2009, including multiple times per week between 2004 and 2006, starting when TK was just 13 years-old. The abuse occurred primarily at Pearse Park, but also in DONLON's home and various other locations, including hotel rooms. The abuse consisted of masturbation and oral sex by both parties multiple times per week. DONLON attempted to have anal intercourse on one occasion at DONLON's home (the subject of an attempted rape charge), which TK resisted. TK alleged that, over time, the sexual abuse lessened as he resisted it, and the physical abuse increased. DONLON is also charged with falsely imprisoning TK, harassing him, and damaging TK's property.

12. The victims have provided independent statements detailing serious and repeated abuses suffered at the hands of DONLON. The victim's statements are internally and independently corroborated. For example, victim TK's statement is independently corroborated by evidence seized pursuant to a search warrant executed at DONLON's home in November 2013, which included, but is not limited to, hotel paperwork containing TK's signature from one of the hotels where TK was reportedly abused, as well as pictures of a nude young male posing with an erect penis. At least two other witnesses – RB and JD – described being solicited by DONLON for photographs of their genitals when they were minors.

Overview of the Pending Charges

13. Due to the large number of pending counts, each charge is summarized in the attached chart (hereinafter, the “DONLON Charges Chart”) including a brief statement of facts supporting a probable cause finding for each charge. *See* Exhibit 2.

14. The charges have been issued on a “sample counts” basis. Victim TK alleges that DONLON abused him (intentional touching and oral contact with genitalia) at least two to three times a week during the period of abuse. The charging documents thus contain eight sample counts of sexual assault (2 per week) and eight sample counts of rape per month (2 per week). There are 373 counts encompassing DONLON’s criminal conduct against TK: 190 counts of sexual assault, 176 counts of rape, 1 count of attempted rape, 3 counts of assault causing harm, 1 count of false imprisonment, 1 count of criminal damage to property, and 1 count of harassment. *See* Exhibit 1, EXT-DONLON-00215-583, and EXT-DONLON-00610 through 987; *see also* Exhibit 2, pages 1 - 62.

15. The charges relating to victim CM are broadly framed as having occurred on a quarterly basis between 2005 and 2009. There are 21 charged offenses of sexual assault encompassing this abuse. *See* Exhibit 1, EXT-DONLON-00584 through 604, and EXT-DONLON-00988 through 1004; *see also* Exhibit 2, pages 62 - 66.

DONLON’s Current Location

16. DONLON may be found within the jurisdiction of this Court. In September 2018, the Irish Garda, through Homeland Security Investigations (HSI) Attaché, London, requested assistance in locating DONLON in the United States. Through investigation, HSI New York has located DONLON living in the town of Guilderland, a suburb of Albany. Specifically, HSI has determined that DONLON has resided at 2568 Western Avenue, Apartment 5-6 in the village of

Altamont, New York, within the town of Guilderland, since in or about April 2018. DONLON's current address has been verified through surveillance, utility records, cable records, and postal records. DONLON was last observed at this apartment on January 13, 2019.

17. DONLON would be likely to flee if he learned of the existence of a warrant for his arrest because there is evidence that DONLON may be deliberately avoiding participation in the criminal proceedings against him in Ireland. After search warrants were executed in Ireland on DONLON's residences in November 2013, DONLON's attorney offered to meet with the investigation team. DONLON, however, subsequently fled the jurisdiction. He travelled to the United States and then to the United Kingdom. Attempts to reach DONLON were made in the United Kingdom, including by mail and phone. No response was received, and, as detailed above, recent investigation has revealed DONLON to be currently living in the United States.

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Request for Arrest Warrant

18. WHEREFORE, the undersigned requests that a warrant for the arrest of DONLON be issued in accordance with 18 U.S.C. § 3184 and the extradition treaty between the United States and Ireland, so that the fugitive may be arrested and brought before this Court to the end that the evidence of criminality may be heard and considered and that this complaint and the warrant be placed under the seal of the Court until such time as the warrant is executed.



EMMET J. O'HANLON
Assistant United States Attorney

Sworn and subscribed before me
this 16 day of January, 2019.



HON. DANIEL J. STEWART
UNITED STATES MAGISTRATE JUDGE