

SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
MORGAN M. VEDEJS, Bar No. 15804
ANNA L. ROSSI, Bar No. 14099
Deputy District Attorneys
35 East 500 South
Salt Lake City, UT 84111
Telephone: (385) 468-7600

IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT
IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

THE STATE OF UTAH,

Plaintiff,

vs.

IVAN JESUS ACOSTA,
DOB: 08/24/1993,
1136 W. Elba Ave.
Salt Lake City, UT 84119
OTN 61291977
SO# 426753
Booking# 21009879
SID#

Defendant;

Jorge Medina-Reyes,

Co-Defendant;

Carolina Marquez,

Co-Defendant;

Orlando Tobar,

Co-Defendant;

Screened by: HOMICIDE UNIT
Assigned to: MORGAN M. VEDEJS
ANNA L. ROSSI

INFORMATION

NO BAIL: PRETRIAL DETENTION

Warrant/Release: IN SALT LAKE COUNTY
JAIL

Case No.
DA Case No. 21005146

Case No. 211901995
DA Case No. 21002821

Case No.
DA Case No. 21005142

Case No. 211901994
DA Case No. 21002820

Fernando Morales,

Co-Defendant;

Cristian Morales

Co-Defendant.

Case No.

DA Case No. 21005145

Case No.

DA Case No. 21005368

The undersigned, Detective J. Stillion - UNIFIED POLICE DEPARTMENT, Agency Case No. 21-15849, upon a written declaration states on information and belief that the defendant, IVAN JESUS ACOSTA, committed the crimes of:

COUNT 1

OBSTRUCTING JUSTICE, 76-8-306(1) UCA, First Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, with intent to hinder, delay, or prevent the investigation, apprehension, prosecution, conviction, or punishment of any person regarding conduct that constituted a criminal offense, altered, destroyed, concealed, or removed any item or other thing; or made, presented, or used any item or thing known by the actor to be false; or harbored or concealed a person; or provided a person with transportation, disguise, or other means of avoiding discovery or apprehension; or warned any person of impending discovery or apprehension; or provided false information regarding a suspect, a witness, the conduct constituting an offense, or any other material aspect of the investigation; and the conduct which constituted a criminal offense would be a capital felony or first degree felony.

NOTICE IS GIVEN pursuant to Utah Code Annotated §76-3-203.1, that the defendant is subject to an enhanced penalty as provided in that section because the above offense was committed in concert with two or more persons.

COUNT 2

ABUSE OR DESECRATION OF A HUMAN BODY, 76-9-704 UCA, Third Degree Felony, as follows: That on or about February 06, 2021 at 5133 W. 5400 S., in Salt Lake County, State of Utah, the defendant, a party to the offense, intentionally and unlawfully disturbed, moved, removed, concealed, or destroyed a dead human body or any part of it.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

A. Zuniga, S. Warden, J. Thomas, R. Tejade, V. Shaw, J. Romero-McDonald, M. Romero, H. Reynaud, J. Reyes-McDonald, J. Medina-Landaeta, G. Medina, H. Martin, A. M., H. Lohrke, P. Jin, B. Hulse, A. Horn, K. Gleue, L. Garcia, J. Flores, S. Fausett, R. Dean, G. Clark, D. Cannavo, S. Brobeck, J. Bersamin, A. Bartholomew, R. Andrews, D. Anderson, J. Stillion, Dr. Kallan.

DECLARATION OF PROBABLE CAUSE:

On February 6, 2021, Unified police were called on a report of a kidnapping at 5133 W. 5400 S. in Salt Lake County. Information received was that the adult female victim, Nicole Romero, had sent a friend a video message stating there were two males with guns, making her leave her residence. Witnesses in the area reported a woman being forced into a vehicle. Surveillance video in the area showed one man, later identified to be ORLANDO TOBAR, force Nicole into a green Toyota Camry, with another male, later identified to be JORGE MEDINA, waiting in the driver seat of the Camry.

Several witnesses stated that they were at 1136 W. Elba Ave., in West Valley City, Utah when Nicole Romero was brought to the residence at knife point. The witnesses stated that Nicole was forced into the apartment by two men. One of the witnesses stated a male, only known as Chaparro (later identified as TOBAR), was holding a knife against Nicole. Nicole was taken to a studio apartment within the residence. The witnesses stated that Chaparro directed Moreno (later identified as MEDINA-REYES) to stand behind Nicole while Chaparro was standing in front of Nicole and holding on to her. Chaparro was questioning Nicole regarding what she told police that resulted in one of his close associates being arrested and taken into federal custody. Nicole denied talking to police. The State has verified through police records, however, that the named individual was arrested and is in federal custody, and that the individual was a relative of CAROLINA MARQUEZ. While in the apartment and being held as described above, Nicole started telling one of the witnesses that her husband did not commit suicide as the witness believed but was murdered by these two men. Chaparro stated that she knew too much, and she was not going to leave that apartment. Chaparro then moved his head to the side of Nicole and Moreno shot Nicole in the back of the head. Chaparro then laid Nicole on the floor. All the witnesses immediately exited the apartment and walked outside, leaving TOBAR, MEDINA-REYES and CAROLINA MARQUEZ inside the apartment with Nicole. Once outside, the witnesses heard another gunshot and then witnessed Chaparro walk outside holding a gun with blood on his hands. Witnesses heard TOBAR say that he had to shoot Nicole a second time. Nicole's body was next seen by witnesses wrapped in black plastic garbage bags, being loaded into the back of a landscape trailer attached to a white pickup truck. They did not see her

again. Witnesses reported that Chaparro, Moreno, and a third party known only as "The Mechanic," disposed of Nicole's body. Chaparro forced one of the witnesses into the apartment to clean up Nicole's blood.

Through electronic data, including cell phones and social media, Chaparro was identified as ORLANDO TOBAR and Moreno was identified as JORGE MEDINA-REYES. Witnesses at the scene positively identified TOBAR and MEDINA-REYES as the two men who shot Nicole.

A search of TOBAR'S residence yielded a .40 caliber Bersa pistol that was the same caliber that was used in the homicide. The pistol had been soaked in a chemical that had started corroding the gun. Witnesses identified the pistol as the same gun used to shoot Nicole. It was later discovered the pistol had been reported stolen out of Vernal, Utah one year prior.

Michelle Romero stated she was on a phone call with Nicole Romero just prior to her being kidnapped. Nicole told Michelle that FERNANDO MARQUEZ (her landlord) and two other males were threatening her with guns. This was the last contact Michelle had with Nicole.

TOBAR stated post-*Miranda* that CAROLINA MARQUEZ instructed him and MEDINA-REYES to pick up Nicole because she owned CAROLINA MARQUEZ money. TOBAR and MEDINA-REYES picked up Nicole in Kearns in MEDINA-REYES' Toyota Camry. TOBAR sat in the back seat, a male named Caleb was in the front seat and MEDINA-REYES was driving. Once they picked up Nicole, she sat in the front. CAROLINA MARQUEZ told them to kill time, as she was unavailable for a few hours. The four of them drove to the Wyoming border and back.

IVAN ACOSTA stated post-*Miranda* that he was at 1136 W. Elba Ave. when Nicole was brought there by TOBAR and MEDINA-REYES. He was outside of the apartment when he heard a gunshot. CAROLINA MARQUEZ was at the residence with him. After the shooting, all parties from the house went to the restaurant. ACOSTA stated while at CAROLINA MARQUEZ' restaurant, Tacos Mi Carmelo, TOBAR called someone known as "The Mechanic", later identified as CRISTIAN MORALES, to come assist him with disposing of Nicole's body. ACOSTA stated TOBAR left the scene with "The Mechanic" to return to the residence. ACOSTA stated CAROLINA MARQUEZ, FERNANDO MARQUEZ, TOBAR, MEDINA-REYES, and MORALES returned to the residence and CAROLINA MARQUEZ began cleaning up the remainder of the blood. ACOSTA stated TOBAR and MORALES left in a white truck with a trailer to dispose of Nicole's body.

Video surveillance obtained from Tacos Mi Carmelo showed CAROLINA MARQUEZ, TOBAR, MEDINA-REYES and FERNANDO MARQUEZ meeting in CAROLINA MARQUEZ's office for a period of time immediately after the shooting occurred and before returning to the house to clean the scene. A male, later identified to be PEDRO REYES, is seen on video grabbing black garbage bags off a shelf and giving them to TOBAR.

Police body-cam footage from 02/06/2021 at approx. 2245 shows West Valley Police at 1136 W. Elba Ave. on a welfare check for Nicole. It shows CAROLINA MARQUEZ, FERNANDO MARQUEZ, and ACOSTA at the West Valley apartment, just hours after the shooting, moving items out of the apartment and locking the apartment door. They appeared to be cleaning the apartment, consistent with the items in the basket they were carrying being paper towels and cleaner.

On March 26, 2021, detectives located a body wrapped in black plastic garbage bags consistent with witness statements of the shooting, the efforts made to dispose of Nicole's body, the black garbage bags given to TOBAR as seen on video, and black garbage bags recovered from Tacos Mi Carmelo . The body was later determined to be Nicole Romero.

On March 26, 2021, Dr. J. Kallan, Assistant Medical Examiner with the Utah Office of the Medical Examiner, performed an autopsy on Nicole Romero. Dr. Kallan preliminarily determined that Nicole had been shot two times in the head. Dr. Kallan preliminarily determined her cause of death to be the gunshots, and her manner of death to be homicide.

REQUEST FOR PRETRIAL DETENTION:

Pursuant to Utah Code 77-20-1(2) and 77-20-1(6), the State is submitting a Motion for Pretrial Detention and a Proposed Warrant to detain the Defendant without bail until further notice. The State's Motion and Proposed Warrant Request have been filed in conjunction with this Information.

Pursuant to Utah Code Annotated § 78B-18a-106 (2018) I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on the 2nd day of April, 2021,
in Salt Lake County, Utah

/s/ J. Stillion

J. Stillion
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Morgan M. Vedejs

Deputy District Attorney
2nd day of April, 2021
SG / MMV / DA Case No. 21005146

STATE vs IVAN JESUS ACOSTA
DAO # 21005146
Page 1

OTHER PENDING CASES FOR THE DEFENDANT

<u>Court</u>	<u>Court Case #</u>	<u>Trial Judge</u>	<u>DAO#</u>	<u>Charge</u>
--------------	---------------------	--------------------	-------------	---------------

SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
MORGAN M. VEDEJS, Bar No. 15804
ANNA L. ROSSI, Bar No. 14099
Deputy District Attorneys
35 East 500 South
Salt Lake City, UT 84111
Telephone: (385) 468-7600

IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT

IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

THE STATE OF UTAH,

Plaintiff,

vs.

FERNANDO MARQUEZ,

DOB: 04/10/1998,

5133 W 5400 S

Kearns, UT 84088

OTN 61291993

SO# 413343

Booking# 21009883

SID#

Defendant;

Jorge Medina-Reyes,

Co-Defendant;

Carolina Marquez,

Co-Defendant;

Orlando Tobar,

Co-Defendant;

Screened by: HOMICIDE UNIT
Assigned to: MORGAN M. VEDEJS
ANNA L. ROSSI

INFORMATION

NO BAIL: PRETRIAL DETENTION

Warrant/Release: IN SALT LAKE COUNTY
JAIL

Case No.

DA Case No. 21005145

Case No. 211901995

DA Case No. 21002821

Case No.

DA Case No. 21005142

Case No. 211901994

DA Case No. 21002820

Cristian Morales,

Co-Defendant;

Ivan Acosta,

Co-Defendant.

Case No.

DA Case No. 21005368

Case No.

DA Case No. 21005146

The undersigned, Detective J. Stillion - UNIFIED POLICE DEPARTMENT, Agency Case No. 21-15849, upon a written declaration states on information and belief that the defendant, FERNANDO MARQUEZ, committed the crimes of:

COUNT 1

MURDER, 76-5-203 UCA, First Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, intentionally or knowingly caused the death of Nicole Romero; or intending to cause serious bodily injury to another, committed an act clearly dangerous to human life that caused the death of Nicole Romero; or acting under circumstances evidencing a depraved indifference to human life, knowingly engaged in conduct which created a grave risk of death to another and thereby caused the death of another; or engaged in the commission, attempted commission, or immediate flight from the commission or attempted commission of Aggravated Kidnapping, or was a party to the Aggravated Kidnapping; and a person other than a party as defined in Utah Code Section 76-2-202 was killed in the course of the commission, attempted commission, or immediate flight from the commission or attempted commission of Aggravated Kidnapping; and the actor acted with the intent required as an element of the Aggravated Kidnapping.

COUNT 2

AGGRAVATED KIDNAPPING, 76-5-302 UCA, First Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, in the course of committing unlawful detention or kidnapping, possessed, used, or threatened to use a dangerous weapon as defined in Utah Code Section 76-1-601; or acted with intent to inflict bodily injury on or to terrorize the victim or another, or to facilitate the commission, attempted commission, or flight after the commission or attempted commission of a felony.

NOTICE IS GIVEN that the defendant caused serious bodily injury to the victim or another individual during the course of committing Aggravated Kidnapping and is therefore subject to enhanced penalties under Utah Code Ann. § 76-5-302(4)(b).

COUNT 3

OBSTRUCTING JUSTICE, 76-8-306(1) UCA, First Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, with intent to hinder, delay, or prevent the investigation, apprehension, prosecution, conviction, or punishment of any person regarding conduct that constituted a criminal offense, altered, destroyed, concealed, or removed any item or other thing; or made, presented, or used any item or thing known by the actor to be false; or harbored or concealed a person; or provided a person with transportation, disguise, or other means of avoiding discovery or apprehension; or warned any person of impending discovery or apprehension; or provided false information regarding a suspect, a witness, the conduct constituting an offense, or any other material aspect of the investigation; and the conduct which constituted a criminal offense would be a capital felony or first degree felony.

NOTICE IS GIVEN pursuant to Utah Code Annotated §76-3-203.1, that the defendant is subject to an enhanced penalty as provided in that section because the above offense was committed in concert with two or more persons.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

A. Zuniga, S. Warden, J. Thomas, R. Tejade, V. Shaw, J. Romero-McDonald, M. Romero, H. Reynaud, J. Reyes-McDonald, J. Medina-Landaeta, G. Medina, H. Martin, A. M., H. Lohrke, P. Jin, B. Hulse, A. Horn, K. Gleue, L. Garcia, J. Flores, S. Fausett, R. Dean, G. Clark, D. Cannavo, S. Brobeck, J. Bersamin, A. Bartholomew, R. Andrews, D. Anderson, J. Stillion, Dr. Kallan.

DECLARATION OF PROBABLE CAUSE:

On February 6, 2021, Unified police were called on a report of a kidnapping at 5133 W. 5400 S. in Salt Lake County. Information received was that the adult female victim, Nicole Romero, had sent a friend a video message stating there were two males with guns, making her leave her residence. Witnesses in the area reported a woman being forced into a vehicle. Surveillance video in the area showed one man, later identified to be ORLANDO TOBAR, force Nicole into a green Toyota Camry, with another male, later identified to be JORGE MEDINA, waiting in the driver seat of the Camry.

Several witnesses stated that they were at 1136 W. Elba Ave., in West Valley City, Utah when Nicole Romero was brought to the residence at knife point. The witnesses stated that Nicole was forced into the apartment by two men. One of the witnesses stated a male, only known as Chaparro (later identified as TOBAR), was holding a knife against Nicole. Nicole was taken to a studio apartment within the residence. The witnesses stated that Chaparro directed

Moreno (later identified as MEDINA-REYES) to stand behind Nicole while Chaparro was standing in front of Nicole and holding on to her. Chaparro was questioning Nicole regarding what she told police that resulted in one of his close associates being arrested and taken into federal custody. Nicole denied talking to police. The State has verified through police records, however, that the named individual was arrested and is in federal custody, and that the individual was a relative of CAROLINA MARQUEZ. While in the apartment and being held as described above, Nicole started telling one of the witnesses that her husband did not commit suicide as the witness believed but was murdered by these two men. Chaparro stated that she knew too much, and she was not going to leave that apartment. Chaparro then moved his head to the side of Nicole and Moreno shot Nicole in the back of the head. Chaparro then laid Nicole on the floor. All the witnesses immediately exited the apartment and walked outside, leaving TOBAR, MEDINA-REYES and CAROLINA MARQUEZ inside the apartment with Nicole. Once outside, the witnesses heard another gunshot and then witnessed Chaparro walk outside holding a gun with blood on his hands. Witnesses heard TOBAR say that he had to shoot Nicole a second time. Nicole's body was next seen by witnesses wrapped in black plastic garbage bags, being loaded into the back of a landscape trailer attached to a white pickup truck. They did not see her again. Witnesses reported that Chaparro, Moreno, and a third party known only as "The Mechanic," disposed of Nicole's body. Chaparro forced one of the witnesses into the apartment to clean up Nicole's blood.

Through electronic data, including cell phones and social media, Chaparro was identified as ORLANDO TOBAR and Moreno was identified as JORGE MEDINA-REYES. Witnesses at the scene positively identified TOBAR and MEDINA-REYES as the two men who shot Nicole.

A search of TOBAR'S residence yielded a .40 caliber Bersa pistol that was the same caliber that was used in the homicide. The pistol had been soaked in a chemical that had started corroding the gun. Witnesses identified the pistol as the same gun used to shoot Nicole. It was later discovered the pistol had been reported stolen out of Vernal, Utah one year prior.

Michelle Romero stated she was on a phone call with Nicole Romero just prior to her being kidnapped. Nicole told Michelle that FERNANDO MARQUEZ (her landlord) and two other males were threatening her with guns. This was the last contact Michelle had with Nicole.

TOBAR stated post-Miranda that CAROLINA MARQUEZ instructed him and MEDINA-REYES to pick up Nicole because she owed CAROLINA MARQUEZ money. TOBAR and MEDINA-REYES picked up Nicole in Kearns in MEDINA-REYES' Toyota Camry. TOBAR sat in the back seat, a male named Caleb was in the front seat and MEDINA-REYES was driving. Once they picked up Nicole, she sat in the front. CAROLINA MARQUEZ told them to kill time, as she was unavailable for a few hours. The four of them drove to the Wyoming border and back.

IVAN ACOSTA stated post-*Miranda* that he was at 1136 W. Elba Ave. when Nicole was brought there by TOBAR and MEDINA-REYES. He was outside of the apartment when he heard a gunshot. CAROLINA MARQUEZ was at the residence with him. After the shooting, all parties from the house went to the restaurant. ACOSTA stated while at CAROLINA MARQUEZ' restaurant, Tacos Mi Carmelo, TOBAR called someone known as "The Mechanic", later identified as CRISTIAN MORALES, to come assist him with disposing of Nicole's body. ACOSTA stated TOBAR left the scene with "The Mechanic" to return to the residence. ACOSTA stated CAROLINA MARQUEZ, FERNANDO MARQUEZ, TOBAR, MEDINA-REYES, and MORALES returned to the residence and CAROLINA MARQUEZ began cleaning up the remainder of the blood. ACOSTA stated TOBAR and MORALES left in a white truck with a trailer to dispose of Nicole's body.

Video surveillance obtained from Tacos Mi Carmelo showed CAROLINA MARQUEZ, TOBAR, MEDINA-REYES and FERNANDO MARQUEZ meeting in CAROLINA MARQUEZ's office for a period of time immediately after the shooting occurred and before returning to the house to clean the scene. A male, later identified to be PEDRO REYES, is seen on video grabbing black garbage bags off a shelf and giving them to TOBAR.

Police body-cam footage from 02/06/2021 at approx. 2245 shows West Valley Police at 1136 W. Elba Ave. on a welfare check for Nicole. It shows CAROLINA MARQUEZ, FERNANDO MARQUEZ, and ACOSTA at the West Valley apartment, just hours after the shooting, moving items out of the apartment and locking the apartment door. They appeared to be cleaning the apartment, consistent with the items in the basket they were carrying being paper towels and cleaner.

On March 26, 2021, detectives located a body wrapped in black plastic garbage bags consistent with witness statements of the shooting, the efforts made to dispose of Nicole's body, the black garbage bags given to TOBAR as seen on video, and black garbage bags recovered from Tacos Mi Carmelo . The body was later determined to be Nicole Romero.

On March 26, 2021, Dr. J. Kallan, Assistant Medical Examiner with the Utah Office of the Medical Examiner, performed an autopsy on Nicole Romero. Dr. Kallan preliminarily determined that Nicole had been shot two times in the head. Dr. Kallan preliminarily determined her cause of death to be the gunshots, and her manner of death to be homicide.

NOTICE IS GIVEN that the defendant caused serious bodily injury to the victim or another individual during the course of committing Aggravated Kidnapping and is therefore subject to enhanced penalties under Utah Code Ann. § 76-5-302(4)(b).

REQUEST FOR PRETRIAL DETENTION:

Pursuant to Utah Code 77-20-1(2) and 77-20-1(6), the State is submitting a Motion for Pretrial Detention and a Proposed Warrant to detain the Defendant without bail until further notice. The State's Motion and Proposed Warrant Request have been filed in conjunction with this Information.

Pursuant to Utah Code Annotated § 78B-18a-106 (2018) I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on the 2nd day of April, 2021,
in Salt Lake County, Utah

/s/ J. Stillion

J. Stillion
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Morgan M. Vedejs

Deputy District Attorney
2nd day of April, 2021
SG / MMV / DA Case No. 21005145

STATE vs FERNANDO MARQUEZ
DAO # 21005145
Page 1

OTHER PENDING CASES FOR THE DEFENDANT

<u>Court</u>	<u>Court Case #</u>	<u>Trial Judge</u>	<u>DAO#</u>	<u>Charge</u>
--------------	---------------------	--------------------	-------------	---------------

SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
MORGAN M. VEDEJS, Bar No. 15804
ANNA L. ROSSI, Bar No. 14099
Deputy District Attorneys
35 East 500 South
Salt Lake City, UT 84111
Telephone: (385) 468-7600

IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT

IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

THE STATE OF UTAH,

Plaintiff,

vs.

CRISTIAN MORALES,
DOB: 10/25/1994,
AKA: THE MECHANIC
UNKNOWN
OTN 61293296
SO# 395656
Booking# 21010145
SID#

Defendant;

Jorge Medina-Reyes,

Co-Defendant;

Carolina Marquez,

Co-Defendant;

Orlando Tobar,

Co-Defendant;

Screened by: HOMICIDE UNIT
Assigned to: MORGAN M. VEDEJS
ANNA L. ROSSI

INFORMATION

NO BAIL: PRETRIAL DETENTION

Warrant/Release: IN SALT LAKE COUNTY
JAIL

Case No.

DA Case No. 21005368

Case No. 211901995

DA Case No. 21002821

Case No.

DA Case No. 21005142

Case No. 211901994

DA Case No. 21002820

Fernando Morales,

Co-Defendant;

Ivan Acosta,

Co-Defendant.

Case No.

DA Case No. 21005145

Case No.

DA Case No. 21005146

The undersigned, Detective J. Stillion - UNIFIED POLICE DEPARTMENT, Agency Case No. 21-15849, upon a written declaration states on information and belief that the defendant, CRISTIAN MORALES, committed the crimes of:

COUNT 1

OBSTRUCTING JUSTICE, 76-8-306(1) UCA, First Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, with intent to hinder, delay, or prevent the investigation, apprehension, prosecution, conviction, or punishment of any person regarding conduct that constituted a criminal offense, altered, destroyed, concealed, or removed any item or other thing; or made, presented, or used any item or thing known by the actor to be false; or harbored or concealed a person; or provided a person with transportation, disguise, or other means of avoiding discovery or apprehension; or warned any person of impending discovery or apprehension; or provided false information regarding a suspect, a witness, the conduct constituting an offense, or any other material aspect of the investigation; and the conduct which constituted a criminal offense would be a capital felony or first degree felony.

NOTICE IS GIVEN pursuant to Utah Code Annotated §76-3-203.1, that the defendant is subject to an enhanced penalty as provided in that section because the above offense was committed in concert with two or more persons.

COUNT 2

ABUSE OR DESECRATION OF A HUMAN BODY, 76-9-704 UCA, Third Degree Felony, as follows: That on or about February 06, 2021 at 5133 W. 5400 S., in Salt Lake County, State of Utah, the defendant, a party to the offense, intentionally and unlawfully disturbed, moved, removed, concealed, or destroyed a dead human body or any part of it.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

A.Zuniga, . S. Warden, J. Thomas, R. Tejade, V. Shaw, J. Romero-McDonald, M. Romero, H. Reynaud, J. Reyes-McDonald, J. Medina-Landaeta, G. Medina, H. Martin, A. M., H.

Lohrke, P. Jin, B. Hulse, A. Horn, K. Gleue, L. Garcia, J. Flores, S. Fausett, R. Dean, G. Clark, D. Cannavo, S. Brobeck, J. Bersamin, A. Bartholomew, R. Andrews, D. Anderson, J. Stillion, Dr. Kallan.

DECLARATION OF PROBABLE CAUSE:

On February 6, 2021, Unified police were called on a report of a kidnapping at 5133 W. 5400 S. in Salt Lake County. Information received was that the adult female victim, Nicole Romero, had sent a friend a video message stating there were two males with guns, making her leave her residence. Witnesses in the area reported a woman being forced into a vehicle. Surveillance video in the area showed one man, later identified to be ORLANDO TOBAR, force Nicole into a green Toyota Camry, with another male, later identified to be JORGE MEDINA, waiting in the driver seat of the Camry.

Several witnesses stated that they were at 1136 W. Elba Ave., in West Valley City, Utah when Nicole Romero was brought to the residence at knife point. The witnesses stated that Nicole was forced into the apartment by two men. One of the witnesses stated a male, only known as Chaparro (later identified as TOBAR), was holding a knife against Nicole. Nicole was taken to a studio apartment within the residence. The witnesses stated that Chaparro directed Moreno (later identified as MEDINA-REYES) to stand behind Nicole while Chaparro was standing in front of Nicole and holding on to her. Chaparro was questioning Nicole regarding what she told police that resulted in one of his close associates being arrested and taken into federal custody. Nicole denied talking to police. The State has verified through police records, however, that the named individual was arrested and is in federal custody, and that the individual was a relative of CAROLINA MARQUEZ. While in the apartment and being held as described above, Nicole started telling one of the witnesses that her husband did not commit suicide as the witness believed but was murdered by these two men. Chaparro stated that she knew too much, and she was not going to leave that apartment. Chaparro then moved his head to the side of Nicole and Moreno shot Nicole in the back of the head. Chaparro then laid Nicole on the floor. All the witnesses immediately exited the apartment and walked outside, leaving TOBAR, MEDINA-REYES and CAROLINA MARQUEZ inside the apartment with Nicole. Once outside, the witnesses heard another gunshot and then witnessed Chaparro walk outside holding a gun with blood on his hands. Witnesses heard TOBAR say that he had to shoot Nicole a second time. Nicole's body was next seen by witnesses wrapped in black plastic garbage bags, being loaded into the back of a landscape trailer attached to a white pickup truck. They did not see her again. Witnesses reported that Chaparro, Moreno, and a third party known only as "The Mechanic," disposed of Nicole's body. Chaparro forced one of the witnesses into the apartment to clean up Nicole's blood.

Through electronic data, including cell phones and social media, Chaparro was identified as ORLANDO TOBAR and Moreno was identified as JORGE MEDINA-REYES. Witnesses at the scene positively identified TOBAR and MEDINA-REYES as the two men who shot Nicole.

A search of TOBAR'S residence yielded a .40 caliber Bersa pistol that was the same caliber that was used in the homicide. The pistol had been soaked in a chemical that had started corroding the gun. Witnesses identified the pistol as the same gun used to shoot Nicole. It was later discovered the pistol had been reported stolen out of Vernal, Utah one year prior.

Michelle Romero stated she was on a phone call with Nicole Romero just prior to her being kidnapped. Nicole told Michelle that FERNANDO MARQUEZ (her landlord) and two other males were threatening her with guns. This was the last contact Michelle had with Nicole.

TOBAR stated post-*Miranda* that CAROLINA MARQUEZ instructed him and MEDINA-REYES to pick up Nicole because she owed CAROLINA MARQUEZ money. TOBAR and MEDINA-REYES picked up Nicole in Kearns in MEDINA-REYES' Toyota Camry. TOBAR sat in the back seat, a male named Caleb was in the front seat and MEDINA-REYES was driving. Once they picked up Nicole, she sat in the front. CAROLINA MARQUEZ told them to kill time, as she was unavailable for a few hours. The four of them drove to the Wyoming border and back.

IVAN ACOSTA stated post-*Miranda* that he was at 1136 W. Elba Ave. when Nicole was brought there by TOBAR and MEDINA-REYES. He was outside of the apartment when he heard a gunshot. CAROLINA MARQUEZ was at the residence with him. After the shooting, all parties from the house went to the restaurant. ACOSTA stated while at CAROLINA MARQUEZ' restaurant, Tacos Mi Carmelo, TOBAR called someone known as "The Mechanic", later identified as CRISTIAN MORALES, to come assist him with disposing of Nicole's body. ACOSTA stated TOBAR left the scene with "The Mechanic" to return to the residence. ACOSTA stated CAROLINA MARQUEZ, FERNANDO MARQUEZ, TOBAR, MEDINA-REYES, and MORALES returned to the residence and CAROLINA MARQUEZ began cleaning up the remainder of the blood. ACOSTA stated TOBAR and MORALES left in a white truck with a trailer to dispose of Nicole's body.

Video surveillance obtained from Tacos Mi Carmelo showed CAROLINA MARQUEZ, TOBAR, MEDINA-REYES and FERNANDO MARQUEZ meeting in CAROLINA MARQUEZ's office for a period of time immediately after the shooting occurred and before returning to the house to clean the scene. A male, later identified to be PEDRO REYES, is seen on video grabbing black garbage bags off a shelf and giving them to TOBAR.

Police body-cam footage from 02/06/2021 at approx. 2245 shows West Valley Police at 1136 W. Elba Ave. on a welfare check for Nicole. It shows CAROLINA MARQUEZ, FERNANDO MARQUEZ, and ACOSTA at the West Valley apartment, just hours after the

shooting, moving items out of the apartment and locking the apartment door. They appeared to be cleaning the apartment, consistent with the items in the basket they were carrying being paper towels and cleaner.

On March 26, 2021, detectives located a body wrapped in black plastic garbage bags consistent with witness statements of the shooting, the efforts made to dispose of Nicole's body, the black garbage bags given to TOBAR as seen on video, and black garbage bags recovered from Tacos Mi Carmelo . The body was later determined to be Nicole Romero.

On March 26, 2021, Dr. J. Kallan, Assistant Medical Examiner with the Utah Office of the Medical Examiner, performed an autopsy on Nicole Romero. Dr. Kallan preliminarily determined that Nicole had been shot two times in the head. Dr. Kallan preliminarily determined her cause of death to be the gunshots, and her manner of death to be homicide.

REQUEST FOR PRETRIAL DETENTION:

Pursuant to Utah Code 77-20-1(2) and 77-20-1(6), the State is submitting a Motion for Pretrial Detention and a Proposed Warrant to detain the Defendant without bail until further notice. The State's Motion and Proposed Warrant Request have been filed in conjunction with this Information.

Pursuant to Utah Code Annotated § 78B-18a-106 (2018) I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on the 2nd day of April, 2021,
in Salt Lake County, Utah

/s/ J. Stillion

J. Stillion
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Morgan M. Vedejs

Deputy District Attorney
2nd day of April, 2021
SG / MMV / DA Case No. 21005368

STATE vs CRISTIAN MORALES
DAO # 21005368
Page 1

OTHER PENDING CASES FOR THE DEFENDANT

<u>Court</u>	<u>Court Case #</u>	<u>Trial Judge</u>	<u>DAO#</u>	<u>Charge</u>
--------------	---------------------	--------------------	-------------	---------------

SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
MORGAN M. VEDEJS, Bar No. 15804
ANNA L. ROSSI, Bar No. 14099
Deputy District Attorneys
35 East 500 South
Salt Lake City, UT 84111
Telephone: (385) 468-7600

IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT

IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

THE STATE OF UTAH,

Plaintiff,

vs.

CAROLINA MARQUEZ,
DOB: 05/27/1982,
1136 W. Elba Ave.
Salt Lake City, UT 84119
OTN 61291910
SO# 425457
Booking# 21009867
SID#

Defendant;

Jorge Medina-Reyes,

Co-Defendant;

Orlando Tobar,

Co-Defendant;

Fernando Marquez,

Co-Defendant;

Screened by: HOMICIDE UNIT
Assigned to: MORGAN M. VEDEJS
ANNA L. ROSSI

INFORMATION

NO BAIL: PRETRIAL DETENTION

Warrant/Release: IN SALT LAKE COUNTY
JAIL

Case No.

DA Case No. 21005142

Case No. 211901995

DA Case No. 21002821

Case No. 211901994

DA Case No. 21002820

Case No.

DA Case No. 21005145

Cristian Morales	Case No.
Co-Defendant;	DA Case No. 21005368
Ivan Acosta,	Case No.
Co-Defendant.	DA Case No. 21005146

The undersigned, Detective J. Stillion - UNIFIED POLICE DEPARTMENT, Agency Case No. 21-15849, upon a written declaration states on information and belief that the defendant, CAROLINA MARQUEZ, committed the crimes of:

COUNT 1

MURDER, 76-5-203 UCA, First Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, intentionally or knowingly caused the death of Nicole Romero; or intending to cause serious bodily injury to another, committed an act clearly dangerous to human life that caused the death of Nicole Romero; or acting under circumstances evidencing a depraved indifference to human life, knowingly engaged in conduct which created a grave risk of death to another and thereby caused the death of another; or engaged in the commission, attempted commission, or immediate flight from the commission or attempted commission of Aggravated Kidnapping, or was a party to the Aggravated Kidnapping; and a person other than a party as defined in Utah Code Section 76-2-202 was killed in the course of the commission, attempted commission, or immediate flight from the commission or attempted commission of Aggravated Kidnapping; and the actor acted with the intent required as an element of the Aggravated Kidnapping.

COUNT 2

AGGRAVATED KIDNAPPING, 76-5-302 UCA, First Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, in the course of committing unlawful detention or kidnapping, possessed, used, or threatened to use a dangerous weapon as defined in Utah Code Section 76-1-601; or acted with intent to inflict bodily injury on or to terrorize the victim or another, or to facilitate the commission, attempted commission, or flight after the commission or attempted commission of a felony.

NOTICE IS GIVEN that the defendant caused serious bodily injury to the victim or another individual during the course of committing Aggravated Kidnapping and is therefore subject to enhanced penalties under Utah Code Ann. § 76-5-302(4)(b).

COUNT 3

OBSTRUCTING JUSTICE, 76-8-306(1) UCA, First Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, with intent to hinder, delay, or prevent the investigation, apprehension, prosecution, conviction, or punishment of any person regarding conduct that constituted a criminal offense, altered, destroyed, concealed, or removed any item or other thing; or made, presented, or used any item or thing known by the actor to be false; or harbored or concealed a person; or provided a person with transportation, disguise, or other means of avoiding discovery or apprehension; or warned any person of impending discovery or apprehension; or provided false information regarding a suspect, a witness, the conduct constituting an offense, or any other material aspect of the investigation; and the conduct which constituted a criminal offense would be a capital felony or first degree felony.

NOTICE IS GIVEN pursuant to Utah Code Annotated §76-3-203.1, that the defendant is subject to an enhanced penalty as provided in that section because the above offense was committed in concert with two or more persons.

COUNT 4

ABUSE OR DESECRATION OF A HUMAN BODY, 76-9-704 UCA, Third Degree Felony, as follows: That on or about February 06, 2021 at 1136 W. Elba Ave., in Salt Lake County, State of Utah, the defendant, a party to the offense, intentionally and unlawfully disturbed, moved, removed, concealed, or destroyed a dead human body or any part of it.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

A. Zuniga, S. Warden, J. Thomas, R. Tejade, V. Shaw, J. Romero-McDonald, M. Romero, H. Reynaud, J. Reyes-McDonald, J. Medina-Landaeta, G. Medina, H. Martin, A. M., H. Lohrke, P. Jin, B. Hulse, A. Horn, K. Gleue, L. Garcia, J. Flores, S. Fausett, R. Dean, G. Clark, D. Cannavo, S. Brobeck, J. Bersamin, A. Bartholomew, R. Andrews, D. Anderson, J. Stillion, Dr. Kallan.

DECLARATION OF PROBABLE CAUSE:

On February 6, 2021, Unified police were called on a report of a kidnapping at 5133 W. 5400 S. in Salt Lake County. Information received was that the adult female victim, Nicole Romero, had sent a friend a video message stating there were two males with guns, making her leave her residence. Witnesses in the area reported a woman being forced into a vehicle. Surveillance video in the area showed one man, later identified to be ORLANDO TOBAR, force Nicole into a green Toyota Camry, with another male, later identified to be JORGE MEDINA, waiting in the driver seat of the Camry.

Several witnesses stated that they were at 1136 W. Elba Ave., in West Valley City, Utah when Nicole Romero was brought to the residence at knife point. The witnesses stated that Nicole was forced into the apartment by two men. One of the witnesses stated a male, only known as Chaparro (later identified as TOBAR), was holding a knife against Nicole. Nicole was taken to a studio apartment within the residence. The witnesses stated that Chaparro directed Moreno (later identified as MEDINA-REYES) to stand behind Nicole while Chaparro was standing in front of Nicole and holding on to her. Chaparro was questioning Nicole regarding what she told police that resulted in one of his close associates being arrested and taken into federal custody. Nicole denied talking to police. The State has verified through police records, however, that the named individual was arrested and is in federal custody, and that the individual was a relative of CAROLINA MARQUEZ. While in the apartment and being held as described above, Nicole started telling one of the witnesses that her husband did not commit suicide as the witness believed but was murdered by these two men. Chaparro stated that she knew too much, and she was not going to leave that apartment. Chaparro then moved his head to the side of Nicole and Moreno shot Nicole in the back of the head. Chaparro then laid Nicole on the floor. All the witnesses immediately exited the apartment and walked outside, leaving TOBAR, MEDINA-REYES and CAROLINA MARQUEZ inside the apartment with Nicole. Once outside, the witnesses heard another gunshot and then witnessed Chaparro walk outside holding a gun with blood on his hands. Witnesses heard TOBAR say that he had to shoot Nicole a second time. Nicole's body was next seen by witnesses wrapped in black plastic garbage bags, being loaded into the back of a landscape trailer attached to a white pickup truck. They did not see her again. Witnesses reported that Chaparro, Moreno, and a third party known only as "The Mechanic," disposed of Nicole's body. Chaparro forced one of the witnesses into the apartment to clean up Nicole's blood.

Through electronic data, including cell phones and social media, Chaparro was identified as ORLANDO TOBAR and Moreno was identified as JORGE MEDINA-REYES. Witnesses at the scene positively identified TOBAR and MEDINA-REYES as the two men who shot Nicole.

A search of TOBAR'S residence yielded a .40 caliber Bersa pistol that was the same caliber that was used in the homicide. The pistol had been soaked in a chemical that had started corroding the gun. Witnesses identified the pistol as the same gun used to shoot Nicole. It was later discovered the pistol had been reported stolen out of Vernal, Utah one year prior.

Michelle Romero stated she was on a phone call with Nicole Romero just prior to her being kidnapped. Nicole told Michelle that FERNANDO MARQUEZ (her landlord) and two other males were threatening her with guns. This was the last contact Michelle had with Nicole.

TOBAR stated post-Miranda that CAROLINA MARQUEZ instructed him and MEDINA-REYES to pick up Nicole because she owned CAROLINA MARQUEZ money. TOBAR and MEDINA-REYES picked up Nicole in Kearns in MEDINA-REYES' Toyota

Camry. TOBAR sat in the back seat, a male named Caleb was in the front seat and MEDINA-REYES was driving. Once they picked up Nicole, she sat in the front. CAROLINA MARQUEZ told them to kill time, as she was unavailable for a few hours. The four of them drove to the Wyoming border and back.

IVAN ACOSTA stated post-*Miranda* that he was at 1136 W. Elba Ave. when Nicole was brought there by TOBAR and MEDINA-REYES. He was outside of the apartment when he heard a gunshot. CAROLINA MARQUEZ was at the residence with him. After the shooting, all parties from the house went to the restaurant. ACOSTA stated while at CAROLINA MARQUEZ' restaurant, Tacos Mi Carmelo, TOBAR called someone known as "The Mechanic", later identified as CRISTIAN MORALES, to come assist him with disposing of Nicole's body. ACOSTA stated TOBAR left the scene with "The Mechanic" to return to the residence. ACOSTA stated CAROLINA MARQUEZ, FERNANDO MARQUEZ, TOBAR, MEDINA-REYES, and MORALES returned to the residence and CAROLINA MARQUEZ began cleaning up the remainder of the blood. ACOSTA stated TOBAR and MORALES left in a white truck with a trailer to dispose of Nicole's body.

Video surveillance obtained from Tacos Mi Carmelo showed CAROLINA MARQUEZ, TOBAR, MEDINA-REYES and FERNANDO MARQUEZ meeting in CAROLINA MARQUEZ's office for a period of time immediately after the shooting occurred and before returning to the house to clean the scene. A male, later identified to be PEDRO REYES, is seen on video grabbing black garbage bags off a shelf and giving them to TOBAR.

Police body-cam footage from 02/06/2021 at approx. 2245 shows West Valley Police at 1136 W. Elba Ave. on a welfare check for Nicole. It shows CAROLINA MARQUEZ, FERNANDO MARQUEZ, and ACOSTA at the West Valley apartment, just hours after the shooting, moving items out of the apartment and locking the apartment door. They appeared to be cleaning the apartment, consistent with the items in the basket they were carrying being paper towels and cleaner.

On March 26, 2021, detectives located a body wrapped in black plastic garbage bags consistent with witness statements of the shooting, the efforts made to dispose of Nicole's body, the black garbage bags given to TOBAR as seen on video, and black garbage bags recovered from Tacos Mi Carmelo . The body was later determined to be Nicole Romero.

On March 26, 2021, Dr. J. Kallan, Assistant Medical Examiner with the Utah Office of the Medical Examiner, performed an autopsy on Nicole Romero. Dr. Kallan preliminarily determined that Nicole had been shot two times in the head. Dr. Kallan preliminarily determined her cause of death to be the gunshots, and her manner of death to be homicide.

NOTICE IS GIVEN that the defendant caused serious bodily injury to the victim or another individual during the course of committing Aggravated Kidnapping and is therefore subject to enhanced penalties under Utah Code Ann. § 76-5-302(4)(b).

REQUEST FOR PRETRIAL DETENTION:

Pursuant to Utah Code 77-20-1(2) and 77-20-1(6), the State is submitting a Motion for Pretrial Detention and a Proposed Warrant to detain the Defendant without bail until further notice. The State's Motion and Proposed Warrant Request have been filed in conjunction with this Information.

Pursuant to Utah Code Annotated § 78B-18a-106 (2018) I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on the 2nd day of April, 2021,
in Salt Lake County, Utah

/s/ J. Stillion

J. Stillion
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Morgan M. Vedejs

Deputy District Attorney
2nd day of April, 2021
SG /MMV / DA Case No. 21005142

STATE vs CAROLINA MARQUEZ
DAO # 21005142
Page 1

OTHER PENDING CASES FOR THE DEFENDANT

<u>Court</u>	<u>Court Case #</u>	<u>Trial Judge</u>	<u>DAO#</u>	<u>Charge</u>
--------------	---------------------	--------------------	-------------	---------------