

DA #: 19-1049
Court Case #: RCR2019 100406
Dept: 2

FILED

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DECATER THOMAS
RENO JUSTICE COURT

BY SW

1 IN THE MATTER OF AN APPLICATION
2 FOR AN ARREST WARRANT FOR:
3 Wilber Ernesto Martinez Guzman,
4 _____/

5 AFFIDAVIT IN SUPPORT OF
6 COMPLAINT AND WARRANT OF ARREST

7 STATE OF NEVADA)
8) ss.
9 COUNTY OF WASHOE)

10 I, Detective Stefanie Brady, do hereby swear under the
11 penalty of perjury that the assertions of this affidavit are true.

12 1. That your affiant is a Detective with the Washoe County Sheriff's
13 Office (WCSO). In that capacity, and in conjunction with the
14 Douglas County Sheriff's Office (DCSO), I am currently assigned to
15 the investigation into the murders of Constance (Connie) Koontz,
16 Sophia Renken, and Gerald (Jerry) and Sharon (Sherri) David. Ms.
17 Koontz was murdered in her residence located at 1439 James Road,
18 Gardnerville, Nevada, sometime between 9:00 PM, on January 9, 2019,
19 and 9:50 AM, on January 10, 2019. Ms. Renken was murdered in her
20 residence located at 943 Dresserville Road, Gardnerville, Nevada,
21 sometime between 4:00 PM, on January 12, 2019, and 1:00 PM, on
22 January 13, 2019. Mrs. David and Mr. David were murdered in their
23 residence located at 760 La Guardia Lane, Reno, Nevada, sometime
24 between 11:30 AM on January 15, 2019, and 4:00 PM on January 16,
25 2019. Moreover, I am assigned to the investigation into burglaries
26 that occurred at the aforementioned residence of Mrs. and Mr. David
on or about January 3, and/or January 4, 2019. The facts and

1 circumstances of these investigations are documented under the
2 following case numbers: WCSO 19-306, DCSO 19SO01032 and 19SO01327.
3 Your affiant is informed and believes and thereupon alleges the
4 following to be a sufficient representation of facts to establish
5 probable cause to believe that Wilber Ernesto Martinez Guzman has
6 committed four (4) counts of Murder with the use of a Deadly
7 Weapon, a violation of NRS 200.010, NRS 200.030, and NRS 193.165,
8 felonies, one count of Burglary, a violation of NRS 205.060, a
9 felony, and four (4) counts of Burglary involving a Firearm, a
10 violation of NRS 205.060, felonies, which were committed on or
11 about January 3, 2019, January 4, 2019, January 9-10, 2019, January
12 12-13, 2019, and January 15-16, 2019, in Washoe County, Nevada and
13 Douglas County, Nevada.

14 2. On or about January 3, 2019, and/or January 4, 2019, Mr. David
15 discovered that structures and/or a trailer on the Davids'
16 aforementioned property had been burglarized. It was noted that
17 during these burglaries a skill saw, several fishing poles, and a
18 hunting bag which contained items including ammunition and possibly
19 a pistol were stolen. This information was provided by Mr. David
20 to a caretaker for his property and corroborated by entries on a
21 calendar found in the Davids' residence.

22 3. On January 10, 2019, Ms. Koontz was found deceased in her
23 aforementioned residence. There did not appear to be any forced
24 entry. The main garage door was open, the door from the garage
25 into the home was open and the garage man door to the back yard was
26 open. The investigation suggests that Ms. Koontz was killed by a

1 single gunshot to the head with a .22 caliber firearm. There was
2 no expended shell casing found on scene. Numerous items were
3 stolen from the residence including jewelry, an Apple watch,
4 iPhone, and an iMac all-in-one desk top computer.

5 4. On January 13, 2019, Ms. Renken was found deceased in her
6 aforementioned residence. The main gate to Ms. Renken's
7 approximately 1.63 acre property was askew and a gate to a dog run
8 on the back of the property was open. Ms. Renken was found on the
9 master bedroom floor. Ms. Renken was shot four times. The
10 investigation revealed that the perpetrator fired at least five
11 shots inside the residence. A near completely intact expended .22
12 caliber round was found on the hallway floor, and a portion of an
13 expended .22 caliber round was recovered from the door jamb of a
14 closet/pantry near the kitchen and hallway area of the residence.
15 The investigation suggests Ms. Renken was shot in the face with .22
16 caliber "snake shot" and was then shot three more times while
17 attempting to retreat into her bedroom, or while in her bedroom,
18 where she ultimately succumbed to the four gunshot wounds. No
19 expended shell casings were found at the scene.

20 5. On January 16, 2019, Mr. and Mrs. David were found deceased in
21 their aforementioned residence. Responding WCSO deputies
22 discovered an open door leading into a mudroom in the rear of the
23 residence. Upon entering the mudroom Deputies discovered Mrs.
24 David. Deputies then found Mr. David in the master bedroom. Both
25 victims had been shot in the head. Deputies further discovered
26 that the David residence had been ransacked consistent with a

1 burglary; drawers and cabinets were open and property was missing.
2 Two empty gun cabinets were located. Deputies also discovered a
3 live .22 caliber "snake shot" round, laying on the floor of the
4 kitchen. No expended shell casings were found at the scene.

5 6. On January 13, 2018, DCSO Detectives applied for and received a
6 search warrant seeking records and connection information
7 associated to Ms. Koontz's stolen Apple Watch from the technology
8 company Apple. DCSO Detectives received records and data from
9 Apple pursuant to the search warrant issued on January 13, 2019.
10 Upon a review of the records and data received from Apple, it was
11 learned that Ms. Koontz's Apple Watch attempted to connect to Apple
12 services using an Apple Account that did not belong to Ms. Koontz.
13 DCSO Detectives were able to determine that the connections
14 attempted by Ms. Koontz's Apple Watch using the Apple Account not
15 belonging to her occurred after Ms. Koontz's murder. DCSO
16 Detectives determined that the Apple Account used by Ms. Koontz's
17 Apple Watch to connect to Apple services after her murder was an
18 Apple Account that likely belonged to Sonia Guzman living in Carson
19 City, Nevada.

20 7. While investigating Ms. Guzman's identity, law enforcement officers
21 determined that Ms. Guzman had a son, identified as Wilber Ernesto
22 Martinez Guzman (hereinafter referred to as "Martinez Guzman").
23 His date of birth is believed to be February 2, 1999.

24 8. Detectives learned from the Nevada Department of Motor Vehicles
25 database that Ms. Guzman registered two vehicles to her name on
26 January 8, 2019, using an address of 2890 Menlo Drive, Apartment

1 11, Carson City. Ms. Guzman registered a 2006 BMW 325i sedan
2 bearing Nevada license plate 949ZHS and a 2011 Toyota Corolla sedan
3 bearing Nevada license plate 024G54.

4 9. Through the course of the investigation into the events at the
5 residence of Mr. and Mrs. David, detectives were informed about a
6 former landscaper who was providing their landscape services. The
7 landscaper was identified and interviewed in furtherance of this
8 investigation. Through the course of the interview, detectives
9 were informed that a person identified as "Ernesto" worked at Mr.
10 and Mrs. David's residence from April 2018 through the end of July
11 2018. Detectives were informed that "Ernesto" had worked at the
12 Davids' residence approximately ten (10) to fourteen (14) times
13 during those months. "Ernesto" was confirmed to be Martinez Guzman
14 via a photograph shown to the landscaper.

15 10. On January 18, 2019, the WCSO, the DCSO, the Carson City
16 Sheriff's Office (CCSO), and the Federal Bureau of Investigation,
17 initiated a surveillance and intelligence gathering operation
18 related to Ms. Guzman and her son, Martinez Guzman. While
19 surveilling the aforementioned Menlo Drive residence, Detectives
20 witnessed a male subject, matching the description of Martinez
21 Guzman, frequently coming and going. Martinez Guzman was driving
22 to locations nearby, and returning home, repeatedly. Martinez
23 Guzman was driving the 2006 BMW.

24 11. On January 19, 2019, detectives learned Martinez Guzman pawned a
25 gold "Elks" ring in Carson City, Nevada, on January 17, 2018.
26 Detectives have determined that the gold ring was stolen from the

1 scene of the Davids' murders on January 15-16, 2019. It was also
2 learned that Martinez Guzman pawned 16 silver rings in Carson City,
3 Nevada, on January 14, 2019. Detectives determined the 16 silver
4 rings were stolen from the scene of Ms. Koontz's murder on January
5 9-10, 2019.

6 12. On January 19, 2019, at approximately 3:50 PM, Martinez Guzman
7 was contacted by members of the CCSO and arrested for possession of
8 stolen property and burglary in Carson City, Nevada, related to the
9 above mentioned pawn transactions. When Mr. Martinez Guzman was
10 taken into custody, he was driving the aforementioned 2006 BMW.

11 13. That same day, your affiant conducted an interview with Martinez
12 Guzman at the CCSO. During the interview, Martinez Guzman
13 confirmed that he lived at the aforementioned Menlo Drive address.
14 He also confirmed that he was previously employed as a landscaper
15 for the individual's company described above in paragraph 9.

16 14. Martinez Guzman admitted that he burglarized Mr. and Mrs.
17 David's aforementioned property a "few weeks" before the murders of
18 Ms. Koontz and Ms. Renken. Martinez Guzman indicated that he went
19 to the Davids' residence in Reno a total of three (3) times, but
20 burglarized out-buildings the first two (2) times. Martinez Guzman
21 stated the first time he took only a "machine" which he described
22 as "one of those small ones to cut a thing."

23 15. With respect to the second burglary, Martinez Guzman admitted to
24 stealing fishing poles and a "revolver" that were located within a
25 trailer. He described the gun to hold nine (9) bullets and had
26 been located in a "case" in the trailer when he took it.

1 16. Martinez Guzman admitted that he used this stolen revolver from
2 the Davids' trailer in the murders of both Ms. Koontz and Ms.
3 Renken. He additionally admitted that he used this same revolver
4 in the murders of the "elderly couple" from Reno - identified as
5 Mr. and Mrs. David.

6 17. As to the murder of Ms. Koontz, Martinez Guzman explained that
7 he entered her residence through an open/unlocked back door. He
8 explained that a woman came out and he shot her. Martinez Guzman
9 went on to admit that he stole an Apple watch and a computer from
10 this residence.

11 18. As to the murder of Ms. Renken, Martinez Guzman stated he
12 entered through an open/unlocked back door. Martinez Guzman
13 indicated that a woman woke up and came out. He admitted that he
14 shot the victim "several times and then I ran." Martinez Guzman
15 was adamant that he did not steal anything from this residence as
16 he "got scared".

17 19. As to the murders of Mr. and Mrs. David on January 16, 2019,
18 Martinez Guzman stated that, at approximately 0600 hours, he
19 arrived at the Davids' residence. Martinez Guzman indicated that,
20 while he was entering the residence, "The lady was coming out. I
21 got scared and shot at her." Martinez Guzman went on to indicate
22 that the male victim was sitting on the bed, getting dressed when
23 Martinez Guzman shot him. From the Davids' residence, Martinez
24 Guzman admitted that he stole guns and anything else he thought he
25 "could use."
26

1 20. Your affiant asked about the location of the gun that was used
2 in the commission of the four (4) homicides referenced above.
3 Martinez Guzman stated that the gun was inside the BMW he was
4 driving when arrested.

5 21. Martinez Guzman was asked about the location of the property
6 taken from the residence of Mr. and Mrs. David. He indicated that
7 he buried the stolen property near a "rifle range" in Carson City.
8 Martinez Guzman provided a description of the location of the
9 items.

10 22. Detectives completed a search of the area described by Martinez
11 Guzman. They located a large hole dug in the ground. In the hole
12 they found guns, ammunition, and gun cases belonging to the Davids
13 wrapped in a large tarp.

14 23. Detectives sought and obtained a search warrant for the BMW
15 referenced above. During the execution of the search warrant,
16 detectives located a .22 caliber revolver, with a nine (9) shot
17 cylinder.

18 24. Detectives sought and obtained a search warrant for the
19 Defendant's home at 2890 Menlo Drive #11 in Carson City Nevada.
20 During the execution of that warrant, detectives recovered several
21 items stolen from the residences of Ms. Koontz and Mr. and Mrs.
22 David.

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1 25. DNA evidence was obtained from the live .22 caliber "snake shot"
2 round located in the Davids' aforementioned residence after their
3 murders. DNA evidence was also obtained from the grip area of the
4 .22 caliber revolver, with a nine (9) shot cylinder, recovered from
5 the aforementioned BMW. A reference DNA sample was taken from
6 Martinez Guzman after his arrest by the CCSO. The reference sample
7 taken from Martinez Guzman was determined to be the same as the DNA
8 profiles taken from the live .22 caliber "snake shot" round and the
9 grip area of the .22 caliber revolver.

10 That based upon the foregoing information, your affiant has
11 probable cause to believe that Wilber Ernesto Martinez Guzman has
12 committed four (4) counts of Murder with the use of a Deadly Weapon,
13 a violation of NRS 200.010, NRS 200.030, and NRS 193.165, felonies,
14 one count of Burglary, a violation of NRS 205.060, a felony, and four
15 (4) counts of Burglary involving a Firearm, a violation of NRS
16 205.060, felonies, which were committed on or about January 3, 2019,
17 January 4, 2019, January 9-10, 2019, January 12-13, 2019, and January
18 15-16, 2019, in Washoe County, Nevada and Douglas County, Nevada.

19 Wherefore, your affiant requests that a Warrant of arrest issue
20 for Wilber Ernesto Martinez Guzman.

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STATE OF NEVADA)
) ss.
COUNTY OF WASHOE)


DETECTIVE STEFANIE BRADY

Subscribed and sworn to before me this 20 day of January, 2019.

P. W. Sch
MAGISTRATE