

DA: 19-1049

AGENCY NUMBER: WCSO 19-306, DCSO 19S001032 and 19S001327

FILED

2019 JAN 28 PM 12:03

IN THE JUSTICE COURT OF RENO TOWNSHIP
IN AND FOR THE COUNTY OF WASHOE, STATE OF NEVADA

CLERK THOMAS
RENO JUSTICE COURT
[Signature]

* * *

THE STATE OF NEVADA,

Plaintiff,

Case No.: RCR2019-100406

v.

Dept. No.: 2

WILBER ERNESTO MARTINEZ GUZMAN,

Defendant.

CRIMINAL COMPLAINT

CHRISTOPHER HICKS, District Attorney of the County of Washoe, State of Nevada, and MARK JACKSON, District Attorney of the County of Douglas, State of Nevada, verify and declare upon information and belief and under penalty of perjury, that WILBER ERNESTO MARTINEZ GUZMAN, the defendant above-named, has committed the crime(s) of:

COUNT I. BURGLARY, a violation of NRS 205.060, a category B felony, (50424) in the manner following, to wit:

That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on or about January 3, 2019, within the County of Washoe, State of Nevada, did willfully and unlawfully enter a barn and/or other building belonging to SHARON DAVID and/or GERALD DAVID, located at 760 La Guardia Lane, Washoe County, Nevada with the intent to commit larceny therein.

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1 COUNT II. BURGLARY WHILE GAINING POSSESSION OF A FIREARM, a
2 violation of NRS 205.060, a category B felony, (50425) in the manner
3 following, to wit:

4 That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on
5 or about January 4, 2019, within the County of Washoe, State of
6 Nevada, did willfully and unlawfully enter a trailer and/or other
7 building belonging to SHARON DAVID and/or GERALD DAVID, located at
8 760 La Guardia Lane, Washoe County, Nevada with the intent to commit
9 larceny therein, and at any time during the commission of the crime
10 did gain possession of a firearm or deadly weapon, specifically a .22
11 caliber handgun.

12 COUNT III. MURDER WITH THE USE OF A DEADLY WEAPON, a
13 violation of NRS 200.010, NRS 200.030, and NRS 193.165, a category A
14 felony, (50001) in the manner following, to wit:

15 That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on
16 or about January 9, 2019 and January 10, 2019, within the County of
17 Douglas, State of Nevada, did willfully, unlawfully, and with malice
18 aforethought, deliberation and premeditation, kill CONSTANCE KOONTZ,
19 a human being, by shooting CONSTANCE KOONTZ with a .22 caliber
20 handgun that was obtained during the commission of the burglary that
21 occurred at 760 La Guardia Lane, Washoe County, Nevada as referenced
22 in Count II;

23 AND/OR that the said defendant, WILBER ERNESTO MARTINEZ
24 GUZMAN, on or about January 9, 2019 and January 10, 2019, within the
25 County of Douglas, State of Nevada, did willfully and unlawfully
26 enter the home of CONSTANCE KOONTZ, located at 1439 James Road,

1 Gardnerville, Nevada, with the intent to commit larceny therein and,
2 during the perpetration of said crime, did kill CONSTANCE KOONTZ by
3 shooting her with a .22 caliber handgun that was obtained during the
4 commission of the burglary that occurred at 760 La Guardia Lane,
5 Washoe County, Nevada as referenced in Count II.

6 COUNT IV. BURGLARY WHILE IN POSSESSION OF A FIREARM, a
7 violation of NRS 205.060, a category B felony, (50425) in the manner
8 following, to wit:

9 That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on
10 or about January 9, 2019 and January 10, 2019, within the County of
11 Douglas, State of Nevada, did willfully and unlawfully enter the home
12 of CONSTANCE KOONTZ, located at 1439 James Road, Gardnerville,
13 Nevada, with the intent to commit larceny therein and, at any time
14 during the commission of the crime did have in his possession a
15 firearm or deadly weapon, specifically a .22 caliber handgun that was
16 obtained during the commission of the burglary that occurred at 760
17 La Guardia Lane, Washoe County, Nevada as referenced in Count II.

18 COUNT V. MURDER WITH THE USE OF A DEADLY WEAPON, a
19 violation of NRS 200.010, NRS 200.030, and NRS 193.165, a category A
20 felony, (50001) in the manner following, to wit:

21 That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on
22 or about January 12, 2019 and January 13, 2019, within the County of
23 Douglas, State of Nevada, did willfully, unlawfully, and with malice
24 aforethought, deliberation and premeditation, kill SOPHIA RENKEN, a
25 human being, by shooting SOPHIA RENKEN with a .22 caliber handgun
26 that was obtained during the commission of the burglary that occurred

1 at 760 La Guardia Lane, Washoe County, Nevada as referenced in Count
2 II;

3 AND/OR that the said defendant, WILBER ERNESTO MARTINEZ
4 GUZMAN, on or about January 12, 2019 and January 13, 2019, within the
5 County of Douglas, State of Nevada, did willfully and unlawfully
6 enter the home of SOPHIA RENKEN, located at 943 Dresslerville Road,
7 Gardnerville, Nevada, with the intent to commit larceny therein and,
8 during the perpetration of said crime, did kill SOPHIA RENKEN by
9 shooting her with a .22 caliber handgun that was obtained during the
10 commission of the burglary that occurred at 760 La Guardia Lane,
11 Washoe County, Nevada as referenced in Count II.

12 COUNT VI. BURGLARY WHILE IN POSSESSION OF A FIREARM, a
13 violation of NRS 205.060, a category B felony, (50425) in the manner
14 following, to wit:

15 That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on
16 or about January 12, 2019 and January 13, 2019, within the County of
17 Douglas, State of Nevada, did willfully and unlawfully enter the home
18 of SOPHIA RENKEN, located at 943 Dresslerville Road, Gardnerville,
19 Nevada, with the intent to commit larceny therein and, at any time
20 during the commission of the crime did have in his possession a
21 firearm or deadly weapon, specifically a .22 caliber handgun that was
22 obtained during the commission of the burglary that occurred at 760
23 La Guardia Lane, Washoe County, Nevada as referenced in Count II.

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1 COUNT VII. MURDER WITH THE USE OF A DEADLY WEAPON, a
2 violation of NRS 200.010, NRS 200.030, and NRS 193.165, a category A
3 felony, (50001) in the manner following, to wit:

4 That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on
5 or about January 15, 2019 and January 16, 2019, within the County of
6 Washoe, State of Nevada, did willfully, unlawfully, and with malice
7 aforethought, deliberation and premeditation, kill and murder SHARON
8 DAVID, a human being, by shooting SHARON DAVID with .22 caliber
9 handgun that was obtained during the commission of the burglary that
10 occurred at 760 La Guardia Lane, Washoe County, Nevada as referenced
11 in Count II;

12 AND/OR that the said defendant, WILBER ERNESTO MARTINEZ
13 GUZMAN, on or about January 15, 2019 and January 16, 2019, within the
14 County of Washoe, State of Nevada, did willfully and unlawfully enter
15 the home of SHARON DAVID, located at 760 La Guardia Lane, Washoe
16 County, Nevada, with the intent to commit larceny therein and, during
17 the perpetration of said crime, did kill SHARON DAVID by shooting her
18 with a .22 caliber handgun that was obtained during the commission of
19 the burglary that occurred at 760 La Guardia Lane, Washoe County,
20 Nevada as referenced in Count II.

21 COUNT VIII. MURDER WITH THE USE OF A DEADLY WEAPON, a
22 violation of NRS 200.010, NRS 200.030, and NRS 193.165, a category A
23 felony, (50001) in the manner following, to wit:

24 That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on
25 or about January 15, 2019 and January 16, 2019, within the County of
26 Washoe, State of Nevada, did willfully, unlawfully, and with malice

1 aforethought, deliberation and premeditation, kill and murder GERALD
2 DAVID, a human being, by shooting GERALD DAVID with a .22 caliber
3 handgun that was obtained during the commission of the burglary that
4 occurred at 760 La Guardia Lane, Washoe County, Nevada as referenced
5 in Count II;

6 AND/OR that the said defendant, WILBER ERNESTO MARTINEZ
7 GUZMAN, on or about January 15, 2019 and January 16, 2019, within the
8 County of Washoe, State of Nevada, did willfully and unlawfully enter
9 the home of GERALD DAVID, located at 760 La Guardia Lane, Washoe
10 County, Nevada, with the intent to commit larceny therein and, during
11 the perpetration of said crime, did kill GERALD DAVID by shooting him
12 with a .22 caliber handgun that was obtained during the commission of
13 the burglary that occurred at 760 La Guardia Lane, Washoe County,
14 Nevada as referenced in Count II.

15 COUNT IX. BURGLARY WHILE IN POSSESSION OF A FIREARM, a
16 violation of NRS 205.060, a category B felony, (50425) in the manner
17 following, to wit:


18 That the said defendant, WILBER ERNESTO MARTINEZ GUZMAN, on
19 or about January 15, 2019 and January 16, 2019, within the County of
20 Washoe, State of Nevada, did willfully and unlawfully enter the home
21 of SHARON DAVID and/or GERALD DAVID, located at 760 La Guardia Lane,
22 Washoe County, Nevada, with the intent to commit larceny therein and,
23 at any time during the commission of the crime did have in his
24 possession a firearm or deadly weapon, specifically a .22 caliber
25 handgun that was obtained during the commission of the burglary that
26 occurred at 760 La Guardia Lane, Washoe County, Nevada as referenced

1 in Count II.

2 AFFIRMATION PURSUANT TO NRS 239B.030

3 The undersigned does hereby affirm that the preceding
4 document does not contain the social security number of any person.

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6 DATED this 28th day of January, 2019.

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9
10 CHRISTOPHER HICKS
DISTRICT ATTORNEY

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12 
13 MARK JACKSON
14 DISTRICT ATTORNEY

15 PCN:

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17 Custody:
18 Bailed:
19 Warrant: X

20 District Court Dept:
21 District Attorney:
22 Defense Attorney:
23 Bail NO Bail
24 Restitution:

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