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FILED

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BY \_\_\_\_\_ DA \_\_\_\_\_  
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6  
7 **JUSTICE COURT, LAS VEGAS TOWNSHIP**  
8 **IN AND FOR THE COUNTY OF CLARK, STATE OF NEVADA**

9 STATE OF NEVADA, )

10 Plaintiff, )

11 vs. )

12 JESUS IBARRA,  
ID #1695428, )

13 Defendant. )  
14

CASE NO.: 03F14313X

DEPT. NO. : 8

**CRIMINAL COMPLAINT**

15 The undersigned, BRIAN SANDOVAL, attorney General of the State of Nevada, by and  
16 through his deputy, Brian T. Kunzi, under penalty of perjury, who being first duly sworn, and  
17 within his knowledge, information and belief, complains and charges that JESUS IBARRA, the  
18 above-named Defendant, has committed the offenses of BURGLARY, a felony, in violation of  
19 NRS 205.060, and VIOLATION OF CUSTODY RIGHTS, a felony, in violation of NRS  
20 200.359(1)(a), as follows:

21 **COUNT I**  
22 **BURGLARY**  
**NRS 205.060**

23 Defendant, JESUS IBARRA, on or about June 24, 2003, in the County of Clark, State  
24 of Nevada, willfully, unlawfully and feloniously by day or night entered into a house with the  
25 intent to commit a felony, to wit: entered into the home of Rosa Parra-Romero, located at 141  
26 Del Nido Court, Las Vegas, Nevada, with the intent to remove, detain or conceal a minor child  
27 from the lawful custody of Rosa Parra-Romero in violation of a lawful court custody order.

28 All of which constitutes the crime of BURGLARY, a felony, in violation of NRS 205.060.

**COUNT II**  
**VIOLATION OF CUSTODY RIGHTS**  
**NRS 200.359(1)(a)**

Defendant, JESUS IBARRA, on or about June 24, 2003, in the County of Clark, State of Nevada, having a limited right of custody to a child by operation of law or pursuant to an order, judgment or decree of the court, including a judgment or decree which grants another person rights to custody or visitation of the child, did willfully, unlawfully, and feloniously violate an order, judgment or decree of a court by detaining, concealing, or removing a child from a parent, guardian, or other person having lawful custody or right of visitation of the child, to wit: Said Defendant removed his child, Justin Ibarra, from Defendant's former spouse, Rosa Parra-Romero, residing at 141 Del Nido Court, Las Vegas, Nevada, in violation of a court order issued on the 19th day of May, 2003, by the Eighth Judicial District Court, in and for the County of Clark, State of Nevada, Case No. D-296122.

All of which constitutes the crime of VIOLATION OF CUSTODY RIGHTS, a felony, in violation of NRS 200.359(1)(a).

All of which is contrary to the form, force, and effect of statutes in such cases made and provided, and against the peace and dignity of the State of Nevada. Said complainant makes this declaration subject to the penalty of perjury. The Complainant requests that a warrant be issued for the arrest of JESUS IBARRA in order that said Defendant may be dealt with according to law.

DATED this 18<sup>th</sup> day of August, 2003.

BRIAN SANDOVAL  
Attorney General

By: Brian T. Kunzi  
BRIAN T. KUNZI  
Senior Deputy Attorney General

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**DECLARATION OF WARRANT/SUMMONS**  
(N.R.S. 171.106)  
(N.R.S. 53 amended 07/13/93)

EVENT: 030624-0466

STATE OF NEVADA    )  
                                  ) ss:  
COUNTY OF CLARK    )

S. Southwell, being first duly sworn, deposes and says:

That she is a police officer with the Las Vegas Metropolitan Police Department, being so employed for a period of 5 years, assigned to investigate the crime(s) of Custodial Interference and Burglary committed on or about June 24, 2003, which investigation has developed IBARRA, JESUS as the perpetrator thereof.

**THAT DECLARANT DEVELOPED THE FOLLOWING FACTS IN THE COURSE OF THE INVESTIGATION OF SAID CRIME TO WIT:**

1. That on June 24, 2003 at approximately 07:00, an incident crime report was filed with the Las Vegas Metropolitan Police Department under event number 030624-0466. The victims being Justin Ibarra, and Rosa Parra-Romero. The location of occurrence being 141 Del Nido Ct, Las Vegas Nevada, County of Clark
2. That Rosa Parra-Romero and Jesus Ibarra were married in Tijuana Mexico approximately eight years ago. That Parra-Romero and Ibarra have two children as a result of this union. Jacob Ibarra and Justin Ibarra.
3. That on May 19, 2003 Parra-Romero and Ibarra were granted a absolute Decree of Divorce. That this decree was so entered by the Eight Judicial District Court Family Division Las Vegas Nevada. The case number being D-296122, department J. That this decree was signed by the Honorable Judge Lisa Brown.
4. That this decree states that Parra-Romero, and Ibarra have joint legal custody. That Parra-Romero has primary physical custody. That Ibarra has visitation every other weekend on Sunday from 3:00 p.m. until 6:00 p.m. That this visitation will be supervised and occur only at Parra-Romero's residence. That Parra-Romero has the discretion to allow Ibarra more visitation if she so desires.
5. That on June 24, 2003 at approximately 06:00 Parra-Romero discovered Justin Ibarra missing from the home. That Parra-Romero called 911.
6. That Officers arrived and through the investigation learned that a brown van that matched Ibarra's arrived to the home sometime during the early morning hours on June 24, 2003. That this was captured on video camera.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**DECLARATION OF WARRANT/SUMMONS CONTINUATION**

Page 2

EVENT: 030624-0466

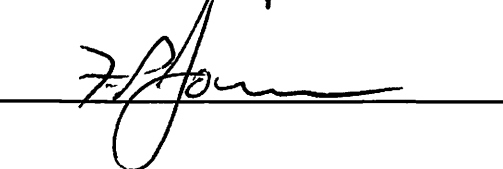
7. That further investigation learned that Ibarra had Justin in his custody at 12 E. Tonopah, North Las Vegas Nevada.
8. That Officers did arrive at 12 E. Tonopah North Las Vegas. That Justin Ibarra was in fact with Ibarra and Officers took Justin into protective custody.
9. That Ibarra was arrested for outstanding warrants,
10. That Detective R Juarez, read Ibarra his Miranda rights. That Ibarra stated he did understand those rights and consented to speak with Detective Juarez and consented to a taped interview. That this was completed on June 24, 2003 11:45 at 3016 West Charleston. This location being the Las Vegas Metropolitan Police Department Crimes Against Youth and Family offices.
11. That under Miranda, Ibarra did state to Detective Juarez, that he traveled to 141 Del Nido Ct to see Justin. That Ibarra did state that he slid the window open and take Justin without the consent or knowledge of Rosa Parra-Romero.
12. That by taking Justin Ibarra without the consent or knowledge of Rosa Parra-Romero and by entering the 141 Del Nido Ct address without the consent of the owner and with the intent to commit a felony , Ibarra is in direct violation of N.R.S. 200.359 Custodial Interference and N.R.S. 205.060 Burglary.

Wherefore, declarant prays that a Warrant of Arrest be issued for suspect IBARRA, JESUS on a charge(s) of Custodial Interference.

**I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.**

Executed on this 9<sup>th</sup> day of July , 2003.

DECLARANT:  #1579

WITNESS: 

DATE: 07/08/03.