

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT
for the
District of Colorado

United States of America)
v.)
Steven Clay Romero)
)
)
)

Defendant(s)

Case No. *09. mj - 01218 - LTM*

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of December 29-30, 2009 in the county of Mesa in the
District of Colorado, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18-9-202, Colorado Statutes and 18 U.S.C. 13	Aggravated Animal Cruelty

This criminal complaint is based on these facts:

Continued on the attached sheet.

[Signature]
Complainant's signature

Clinton P. Foster LE Ranger
Printed name and title

Sworn to before me and signed in my presence.

Date: _____

[Signature]
Judge's signature

City and state: Grand Junction, CO

Magistrate Judge Laird T. Milburn
Printed name and title

AFFIDAVIT

I, Clinton P. Forte, first being duly sworn, depose and state as follows:

I am a US Park Ranger - Law Enforcement Officer employed by the National Park Service, United States Department of the Interior, and I have been so employed for Colorado National Monument since October 11th 2008. I am a graduate of the seasonal Park Ranger Training Program at Northern Arizona University in Flagstaff, AZ. I have received specialized training in crime scene investigation, evidence collection and preservation, and interviewing and interrogation in the course of my law enforcement training and career. I have used these skills often, since my appointment to the position of a US Park Ranger - Law Enforcement Officer, at Colorado National Monument in prosecuting over 200 law enforcement cases. I have a total of 2 years experience working as a US Park Ranger - Law Enforcement Officer for the National Park Service.

- 1) This affidavit is being submitted for the purpose of establishing probable cause in support of an arrest warrant for Steven Clay Romero.
- 2) Your affiant has probable cause to believe that Steven Clay Romero is guilty of Aggravated Cruelty Towards an Animal and will be found at the address listed above.
- 3) This affidavit is based on my personal knowledge and information provided by other law enforcement officers.

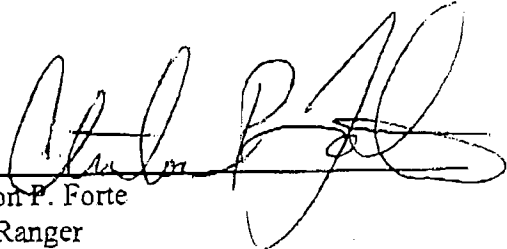
Facts of the Case

- 1) At approx 0430 hours on 12/30/09 , while driving up the West Hill of Colorado National Monument, maintenance worker Greg Crawford observes tire tracks in the snow with drag marks behind them. Approx 2 miles later he discovers the carcass of a dead dog with a rope tied around its neck.

- 2) Approx 0900 hours - Delta resident Matt Manzanaras sees the press release while surfing the GJ Sentinel website and recognizes the dog as belonging to his best friend Joseph Leber. Manzanaras explains that Leber's dogs were stolen on Dec. 29th from downtown Delta. Leber later confirms that "Buddy" was his dog.
- 3) Monument rangers speak with Sergeant Brad Lamb of Delta PD. Lamb faxes a copy of his department's report which explains how a witness took down the license plate of the vehicle that stole the dogs, which led to a residence in Fruita. After reviewing the report, Monument rangers speak with Fruita PD officer Bradshaw, who investigated the Fruita residence, found no evidence and believed the cases were unrelated.
- 4) Video surveillance retrieved from the West Entrance station shows a double-cab pickup entering the Monument at 0218 hours with a dog in the bed of the truck. Cameras in the outbound lane show the same truck leaving the Monument at 0230 hours.
- 5) Rangers Forte and Barnett travel to the Fruita residence where they find paw prints in the snow in the front yard. A neighbor approaches the rangers and explains how he saw one Steven Clay Romero leave the residence with the dog that matched the one that was killed in a pick up matching the one in the Monument surveillance photos. The neighbor stated that Romero left the residence after 0200 hours which would place him the Monument at the corresponding time.
- 6) At approx 1402 Ranger Barnett and I traveled to the home of Jamie Mares and Steven Romero with Deputy Mark Johnson of the Mesa County Sheriff's Office. The suspect vehicle was not present.
- 7) Mares opened the front door and stated that Romero was not home. I asked Mares if we could check the home to see if Romero was in the residence. Mares consented and we conducted a search for Romero, but did not find Romero.
- 8) While in the residence, MCSO Deputy asked for permission to look in the garage for rope used to tie the dog to the suspect vehicle. Mares consented. Matching rope was found in the garage.
- 9) At 1609 hours, we met Romero's sister, with the Fruita PD, at the parking lot of Hastings Bookstore. Romero's sister stated that the dog was in their home and Romero said he was going to kill it. She stated he left with the dog late last night and returned about a half hour later with out it.
- 10) At 1855 hours, Grand Junction Officer Colter Church located the suspect vehicle at the residence. Mares answered the door and was uncooperative with Church. She provided Church with a false phone number for Romero. She had also provided a false number to me for Romero earlier.

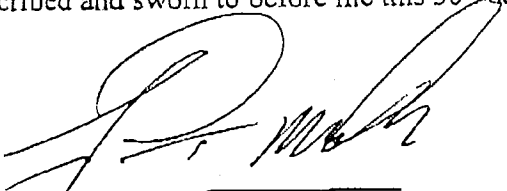
CONCLUSION

- 1) Based upon the information contained in this affidavit, your affiant has reason to believe that Steven Clay Romero committed the felony of aggravated animal cruelty, in violation of 18-9-202 and Title 18, United States Code, Section 13. Your affiant further has reason to believe that Romero resides at 291 Arlington Drive, Grand Junction, Colorado.
- 2) Wherefore, your affiant respectfully requests that this Court issue an arrest warrant for Steven Clay Romero.



 Clinton P. Forte
 Park Ranger
 National Park Service

Subscribed and sworn to before me this 30th day of December, 2009.



HONORABLE LAIRD T. MILBURN
 United States Magistrate Judge District of Colorado

DEFENDANT: STEVEN CLAY ROMERO

YOB: 1972

ADDRESS (CITY/STATE): Grand Junction, CO

COMPLAINT FILED? YES NO

IF YES, PROVIDE MAGISTRATE CASE NUMBER: _____
IF NO, PROCEED TO "OFFENSE" SECTION

HAS DEFENDANT BEEN ARRESTED ON COMPLAINT? YES NO

IF NO, A NEW WARRANT IS REQUIRED

OFFENSES: **COUNT ONE:**
Aggravated Animal Cruelty, in violation of 18-9-202, Colorado Statutes and Title 18 U.S.C. §13.

LOCATION OF OFFENSE (COUNTY/STATE): Mesa County, CO

PENALTY: **COUNT ONE:**
NMT 3 years imprisonment; NMT \$100,000.00 fine, or both; 1 year supervised release; \$100.00 Special Assessment Fee

AGENT: Clint Forte, LE Ranger

AUTHORIZED BY: Michelle M. Heldmyer
Assistant U.S. Attorney

ESTIMATED TIME OF TRIAL:

five days or less over five days other

THE GOVERNMENT

will seek detention in this case will **not** seek detention in this case

The statutory presumption of detention is **not** applicable to this defendant.

OCDETF CASE: _____ Yes X No