

STATE OF NEVADA

Case No. 21-CR-02707S

Dept. No. 14

VS.

Samantha Moreno-Rodriguez

MOTION FOR DISCLOSURE OF  
NON-PUBLIC INFORMATION

(1) PLEASE CHECK ONE OF THE FOLLOWING OPTIONS:

[✓] A member of the following media organization: KTNV

[ ] The following criminal Defendant: \_\_\_\_\_

[ ] An attorney for the following client: \_\_\_\_\_

[ ] OTHER: \_\_\_\_\_

Court staff has indicated that the following document(s) currently in the file are deemed to be presumptively non-public and confidential:

## Criminal Complaint AND ARREST WARRANT

(3) PLEASE EXPLAIN WHY THE COURT SHOULD ALLOW ACCESS TO THE DOCUMENT(S) LISTED ABOVE :

(NOTE: If you need more space, please attach additional pages.)

We require these documents in order to report the facts of the case fairly and completely.

(4) PLEASE SIGN BELOW:

Under the penalty of perjury under the law of the State of Nevada, I swear or affirm that the above information is true and correct, and that the Court should allow access to the requested document(s).

Signature: Jany D Date: 6/9/21

Phone Number: 702-871-3345

ORDER

[ ] This matter will be set for hearing, and all parties will be notified. The hearing date will be at \_\_\_\_\_ M on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

[ ] The motion is denied as to the following documents \_\_\_\_\_  
for the following reason(s):  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

☒ [ ] The motion is granted as to the following documents \_\_\_\_\_

<input checked="" type="checkbox"/> Criminal Complaint	<input type="checkbox"/> Temporary Custody Record	<input type="checkbox"/> Declaration of Arrest Report
<input checked="" type="checkbox"/> Declaration of Warrant/Summons	<input checked="" type="checkbox"/> Arrest Warrant(AW)	<input type="checkbox"/> A.W. Return
<input type="checkbox"/> Impaired Driving Report	<input type="checkbox"/> Dom. Violence Report	<input type="checkbox"/> Standardized FSTs Record
<input type="checkbox"/> _____ (the above-specified documents are approved in their "as redacted" form)		

[ ] OTHER: \_\_\_\_\_

DATED THIS 14 DAY OF June, 2021

[Signature]  
JUSTICE OF THE PEACE

LAS VEGAS METROPOLITAN POLICE DEPARTMENT  
**DECLARATION OF WARRANT/SUMMONS**  
(N.R.S. 171.106)  
(N.R.S. 53 amended 7/13/1993)

21-CR-027076

DWS

Declaration of Warrant Summons (Affidavit)

13681806



STATE OF NEVADA     )     Samantha Moreno-Rodriguez  
                              ) ss:  
COUNTY OF CLARK    )     DOB: [REDACTED]

**FILED**

Event Number: **210500129147**

2021 JUN -7 P 12:54

JUSTICE COURT  
LAS VEGAS NEVADA

BY JR

DEPUTY

Phil DePalma, being first duly sworn, deposes and says:

That he is a Detective with the Las Vegas Metropolitan Police Department, being so employed for a period of 25 years, assigned to investigate the crime(s) of Open Murder committed on or about 05-28-2021, which investigation has developed Samantha Moreno-Rodriguez as the perpetrator thereof.

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

On May 28, 2021, at 0745 hours, a 911 call was placed to LVMPD dispatch regarding a dead body found near the parking lot to the Little Zion trail. LVMPD Resident Officer B. Catricala as well as American Medical Response (AMR) responded to the area and met with the persons reporting (witnesses). The witnesses directed first responders to the body of an unknown juvenile, who was discovered naked, approximately 8 feet from a dirt roadway, in between several sage bushes. Medical professionals determined the juvenile was deceased. LVMPD Homicide Detectives and Crime Scene Analysts (CSA) were summoned and responded to the scene to investigate further.

The scene was determined to be West of Mile Marker 20 and to the north of State Road 160. More specifically, the GPS coordinates were documented as 36.01439, -115.499775. Patrol Officers had secured the area with yellow crime scene tape prior to the arrival of Homicide Detectives. Homicide

## CONTINUATION

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Detectives were briefed by Officer Catricala who advised the witnesses who discovered the body were still on scene.

Detective DePalma spoke with the witnesses who advised they arrived at the base of the Little Zion trail at approximately 0735 hours on May 28<sup>th</sup>, 2021 and before they began their hike, one of the female hikers walked north from their parked vehicle and observed a naked body lay next to some bushes. The witness reported her discovery to her husband, who in turn called 911.

Detective DePalma along with CSA Flores examined the crime scene for evidence and CSA Smith memorialized the scene with photographs. After a preliminary body examination by Clark County Coroner J. Fagnant, and the circumstances surrounding the incident, it was determined the victim appeared to be between 8-10 years of age and the death was suspicious in nature. Other than the initial person(s) reporting the discovery, there were no additional witnesses.

On May 28<sup>th</sup>, 2021, an autopsy was initiated at the Clark County Coroners Office. The Medical Examiner opined the manner of death would be homicide however, a toxicology would first be submitted to finalize the cause of death.

On June 1, 2021, Nicholas [REDACTED] (Nicholas) contacted the San Jose Police Department (SJPd). Nicholas told the SJPd his girlfriend, Samantha Moreno-Rodriguez (Samantha) had left him approximately eight (8) days prior. Samantha reportedly took their child, [REDACTED] but left her cellular telephone and [REDACTED] at their residence. Nicholas did not want to press charges for child stealing; he just wanted Samantha taking [REDACTED] documented.

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Nicholas reported he and Samantha had been having relationship problems for the past two (2) years.

SJPD sent out an All-Persons Broadcast (APB) for Samantha and [REDACTED] the vehicle she was reported to have been driving was a 2007 Dodge SUV with California plates, [REDACTED] SJPD assigned a case number [REDACTED] and provided Nicholas with a copy. SJPD limited the circumstance of Samantha and [REDACTED] disappearance as suspicious.

On June 4, 2021, Jessica [REDACTED] (Jessica) contacted the SJPD and provided the following: Samantha is her friend and Samantha has an [REDACTED], [REDACTED] who has Autism. Samantha and [REDACTED] lived with [REDACTED] father, Nicholas.

Jessica stated she sent a text message to Samantha on May 17, 2021, wishing her happy birthday. Samantha sent Jessica a text later in the day where she said Nicholas was taking them to Las Vegas on May 18, 2021 and they would be returning on May 23, 2021. The text messages exchanged between Jessica and Samantha marked the last time Jessica heard from Samantha.

On June 1<sup>st</sup>, 2021, Jessica received a phone call at approximately 1711 hours from an unknown male caller. The male caller asked for Jessica, who did not tell the caller it was her. Jessica instead pretended to be her sister, and the male caller asked, "have Jessica call me back." Jessica did not call the number back however, called Nicholas later in the day. When Jessica spoke to Nicholas, she asked him what was going on and Nicholas indicated Samantha had left him on May 24, 2021. Nicholas told Jessica when Samantha left, she had taken [REDACTED] with her. Nicholas told Jessica that Samantha had left him a voicemail indicating she was leaving him, although Jessica did not hear the message.

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Jessica had seen the most recent computer-generated composite of the murdered child in Las Vegas, Nevada, now being called "John Little Zion Doe," and thought he may be [REDACTED]

LVMPD Homicide Detectives reviewed the public content on Nicholas' Facebook page and located photographs of [REDACTED]. After comparing the known photographs of [REDACTED] and the photographs taken of "John Little Zion Doe", Detectives believed they may be the same person.

Nicholas provided Detectives his personal cellular telephone number, his work cellular telephone number, as well as Samantha's cellular telephone number.

On June 5, 2021, LVMPD Homicide Detectives contacted SJPD and asked them to contact Nicholas and obtain additional information regarding Samantha and [REDACTED]. SJPD was also asked to obtain potential sources of DNA for [REDACTED]. SJPD provided LVMPD Homicide Detectives with Body Worn Camera (BWC) footage from the June 1, 2021 contact with Nicholas. LVMPD Homicide Detectives reviewed the BWC and were able to determine the call Jessica received at approximately 1711 hours, on June 1, 2021 was from a uniformed SJPD officer who was trying to get more information about Samantha and [REDACTED] disappearance.

SJPD Detectives were able to provide license plates for the vehicles driven by Nicholas and Samantha. A search of law enforcement databases revealed the vehicle driven by Nicholas had not traveled to Southern Nevada and never left the San Jose, California area.

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A search of law enforcement databases revealed the 2007 Dodge Caliber, with California plates of [REDACTED] driven by Samantha, passed through Southern California on May 26, 2021. The vehicle traveled through Victorville, California at approximately 2311 hours. Victorville, California is approximately 167 miles from Las Vegas, Nevada. The vehicle was traveling northbound through Victorville, California, which would have put the vehicle on a direct path to Las Vegas, Nevada.

The 2007 Dodge Caliber, with California plates of [REDACTED] passed through Western Colorado on May 29, 2021 at approximately 0553 hours, eastbound on I-70.

Detectives drafted Search Warrants for the cellular telephones belonging to Nicholas and Samantha. Detectives needed to determine when and where Nicholas and Samantha made or received any cellular telephone calls, as well as determining where the cellular telephone handset had traveled.

On June 5, 2021, Clark County District Court Judge Tierra Jones signed a search warrant for Historical Call Detail Records (CDR) for Nicholas' cellular telephone.

On June 5, 2021, Clark County District Court Judge Tierra Jones signed a search warrant for Historical Call Detail Records (CDR) for Nicholas' additional cellular telephone.

On June 5, 2021, Clark County District Court Judge Tierra Jones signed a search warrant for Historical Call Detail Records (CDR) for the cellular telephone used by Samantha.

Nicholas provided Detectives with multiple Google E-mail (G-mail) accounts for both he and Samantha. Detectives located an additional G-mail account for Samantha, associated with a hotel reservation in Colorado.

Detectives learned Samantha reserved a room at the Days Inn, 9719 East Geddes Avenue, Englewood, Colorado 80122. The reservation was made through the Groupon application and Samantha presented

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her California Driver's License when she checked in. The check in dates were recorded being May 31<sup>st</sup>, 2021 and check out being June 1<sup>st</sup>, 2021. Surveillance video was obtained from the Days Inn, which showed an image of Samantha checking in alone.

On June 5, 2021, Clark County District Court Judge Tierra Jones signed a search warrant for the Gmail accounts belonging to Nicholas and Samantha. Detectives would learn there was nothing beneficial on the Gmail account belonging to Nicholas. Detectives would learn there was nothing beneficial on first three (3) Gmail accounts located for Samantha, as they were older and had not been used in some time.

Detectives were still waiting on the results of the search warrant for one of Samantha's Gmail account.

On June 5, 2021, LVMPD Homicide Detectives received the CDR for Nicholas and Samantha's cellular telephones. A review of the CDR's, Detectives determined none of the handsets left the San Jose, California area after May 17, 2021.

On June 5<sup>th</sup>, 2021, Detective DePalma traveled to the San Jose Police Headquarters where he collected numerous items collected from Nicholas, while at his residence. The items were packaged and sealed by the SJPD Criminalistic Officers. The items were transported back to Las Vegas by Detective DePalma and turned over to the LVMPD Crime Lab.

On June 6<sup>th</sup>, 2021, The LVMPD Forensics Lab processed the items recovered from San Jose. Nicholas [REDACTED] could not be excluded as the biological father of John "Little Zion" Doe. John "Little Zion" Doe was included as a contributor to the DNA profile from the boy's hoodie and pillow, collected in [REDACTED] bedroom in San Jose, California.

Samantha Moreno-Rodriguez traveled with her son, [REDACTED] to Las Vegas, from San Jose where she left [REDACTED] deceased in the desert. Evidence at the scene, multiple injuries upon [REDACTED] body, and the



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circumstances surrounding the investigation leads Detectives to believe Samantha Moreno-Rodriguez was the person responsible for his murder.

Wherefore, Declarant prays that a Warrant of Arrest be issued for suspect Samantha Moreno-Rodriguez on the charge(s) of **Open Murder**.

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

Executed on this 7th day of June, 2021.

DECLARANT:

 5297

WITNESS:

 13346

DATE:

6/7/21

**WARRANT ELECTRONICALLY GENERATED AND ENTERED INTO NCJIS**  
**\*\*\* DO NOT MANUALLY ENTER INTO NCJIS \*\*\*\***

**JUSTICE COURT, LAS VEGAS TOWNSHIP**  
**CLARK COUNTY, NEVADA**

<b>State Of Nevada</b> <b>VS</b> <b>MORENO-RODRIGUEZ, SAMANTHA</b>	<b>Case No:</b> 21-CR-027075 <b>Warrant No:</b> 21CR027075-2021-2 <b>Dept No:</b> 14 <b>Agency:</b> LVMPD
<b>ID#:</b> [REDACTED]	

**Arrest Warrant**

TO: ANY PEACE OFFICER :

A COMPLAINT AND AN AFFIDAVIT UPON OATH HAS THIS DAY BEEN LAID BEFORE ME ACCUSING MORENO-RODRIGUEZ, SAMANTHA, OF THE CRIME(S);

COUNTS	CHARGE	BAIL TERMS	
		CASH	SURETY
001	Open murder [50000] [F]	Hold Without Bail	

YOU ARE, THEREFORE, COMMANDED FORTHWITH TO ARREST THE ABOVE NAMED DEFENDANT AND BRING HIM BEFORE THIS COURT, OR IF THE COURT HAS ADJOURNED, THAT YOU DELIVER HIM INTO THE CUSTODY OF THE SHERIFF OF THE COUNTY OF CLARK, AND BE BROUGHT BEFORE THE NEAREST AVAILABLE MAGISTRATE.

THIS WARRANT MAY BE SERVED AT ANY HOUR OF THE DAY OR NIGHT.

GIVEN UNDER MY HAND THIS **7th DAY OF June 2021**



JUSTICE OF THE PEACE IN AND FOR SAID TOWNSHIP  
**Amy Chelini**

**Warrant Conditions**

Bail to be Set in Court

**SHERIFF'S RETURN**

I HEREBY CERTIFY THAT I RECEIVED THE ABOVE AND FORGOING WARRANT ON THE \_\_\_\_\_ DAY OF \_\_\_\_\_, \_\_\_\_\_, AND SERVED THE SAME BY ARRESTING AND BRINGING DEFENDANT, \_\_\_\_\_, INTO COURT THIS \_\_\_\_\_ DAY OF \_\_\_\_\_.

JOSEPH LOMBARDO, SHERIFF, CLARK COUNTY, NEVADA

BY: \_\_\_\_\_, DEPUTY

JUSTICE COURT, LAS VEGAS TOWNSHIP  
CLARK COUNTY, NEVADA

FILED

THE STATE OF NEVADA,

Plaintiff,

-vs-

SAMANTHA MORENO-RODRIGUEZ,

Defendant.

2021 JUN -7 P 12:54

JUSTICE COURT  
LAS VEGAS NEVADA

BY

JR

21CR027075

14

DA CASE NO: 202127474C

CRIMINAL COMPLAINT

The Defendant above named having committed the crime of MURDER (Category A Felony - NRS 200.010, 200.030 - NOC 50000), in the manner following, to wit: That the said Defendant, on or about the 28th day of May, 2021, at and within the County of Clark, State of Nevada, did willfully, unlawfully, feloniously and with malice aforethought, kill [REDACTED], a human being, by manner and means unknown, the said killing having been willful, deliberate and premeditated.

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.

06/07/21

/jlb  
LVMPD EV# 210500129147  
(TK14)

21-CR-027075  
CRM  
Criminal Complaint  
13681904



JR