

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE

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| POLICE NO. : | 17-006518 |
| PROSECUTOR NO. : | 095437491 |

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| STATE OF MISSOURI, |) | |
| |) | PLAINTIFF, |
| vs. |) | |
| VICENTE ROLDAN-MARRON |) | |
| , 632 N. Peck Ct |) | CASE NO. 1716-CR |
| Independence, MO - 64056 |) | DIVISION |
| DOB: 04/05/1970 |) | |
| Race/Sex: H/M; |) | |
| SSN: |) | |
| |) | DEFENDANT. |

COMPLAINT

Count I. Murder 1st Degree (565.020-001Y19840902.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 565.020, RSMo, committed the class A felony of murder in the first degree punishable upon conviction under Section 565.020, RSMo, in that on or about January 30, 2017, in the County of Jackson, State of Missouri, the defendant after deliberation, knowingly caused the death of Yadira Gomez by stabbing her.

Count II. Armed Criminal Action (571.015-001Y19755299.0)

The Prosecuting Attorney of the County of Jackson, State of Missouri, upon information and belief, charges that the defendant, in violation of Section 571.015, RSMo, committed the felony of armed criminal action, punishable upon conviction under Section (571.015.1) (571.015.2) (571.015.3), RSMo, in that on or about on or about January 30, 2017, in the County of Jackson, State of Missouri, the defendant committed the felony of Murder in the First Degree charged in Count I, all allegations of which are incorporated herein by reference, and the defendant committed the foregoing felony of Murder in the First Degree by, with and through, the knowing use, assistance and aid of a dangerous instrument.

The range of punishment for the offense of Armed Criminal Action in violation of section 571.015 RSMo. is imprisonment in the custody of the Missouri Department of Corrections for a term of years not less than three (3) years without eligibility for parole, probation, conditional release or suspended imposition or execution of sentence for a period of three (3) calendar years.

State vs. Vicente Roldan-Marron

The facts that form the basis for this information and belief are contained in the attached statement(s) of facts, made a part hereof and submitted as a basis upon which this court may find the existence of probable cause.

Wherefore, the Prosecuting Attorney prays that an arrest warrant be issued as provided by law.

JEAN PETERS BAKER
Prosecuting Attorney
Jackson County, Missouri
by,

/s/ Michael J. Hunt
Michael J. Hunt (#34818)
Assistant Prosecuting Attorney
321 W. Lexington
Independence, MO - 64050
(816) 881-3856
mhunt@jacksongov.org

WITNESSES:

PO Evan Bateman , 223 N. Memorial Drive, Independence, MO - 64050
DET Brian Draveling , 223 N. Memorial Drive, Independence, MO - 64050
DET Brice Minter , 223 N. Memorial Drive, Independence, MO - 64050
PO Jeffery Pagel , 223 N. Memorial Drive, Independence, MO - 64050
DET Todd Winborn , 223 N. Memorial Drive, Independence, MO - 64050

PROBABLE CAUSE STATEMENT

Date: 1/30/2017

Report #: 2017-6518

I, Brice Minter, a Detective with the Independence, Missouri, Police Department, knowing that false statements on this form are punishable by law, state that the facts contained herein are true.

1. I have probable cause to believe that on 01/30/2017, at approximately 0919 hours, **VICENTE ROLDAN-MARRON**, (Race- Hispanic, Sex- Male, DOB- 04/05/1970, Address- 632 N. Peck Court, Independence, Missouri 64056, SSN- NONE) committed one or more criminal offenses in Jackson County, Missouri.

2. The facts supporting this belief are as follows:

VICENTE and or referred to hereafter as the **DEFENDANT** committed the act of Murder; 1st Degree and Armed Criminal Action by knowingly causing the death of **YADIRA GOMEZ** by stabbing her multiple times in the chest area with a knife. The following are the supporting facts to the case:

On 01/30/2017 at approximately 0919 hours, Independence Police Officer(s) E. Bateman and D. Wehlermann were dispatched to 1033 S. Brookside Avenue, Independence, Jackson County, Missouri regarding a check the welfare. It was further reported by Independence School District Security Director Dennis Green that information was received from several elementary teachers that two of their students (and or siblings) had disclosed information indicating that their father and or the **DEFENDANT** had killed their mother; Yadira Gomez.

Officers originally responded to the 1033 S. Brookside Avenue residence as maintenance allowed officers inside to check the welfare with negative results. Officers then received updated information from Yadira Gomez's employer that she did not arrive to her scheduled employment as they provided an updated address identified as 632 N. Peck Court, Independence, Missouri.

Officer(s) Bateman and Wehlermann responded to 632 N. Peck Court where contact was made with management as they provided a key to the residence. Officer Bateman indicated that as he unlocked and opened the door; he visually observed a red liquid substance believed to be blood while located in the entry way leading into the kitchen. He further indicated that he observed what appeared to be blood leading up the stairs just to the left of the door. Officer(s) Bateman, Wehlermann and Farnsworth then entered inside the residence through the front door as police announcements were made. As they were clearing the first floor of the apartment, Officer Bateman indicated that he observed a large "butcher" knife located on the kitchen counter that appeared to contain traces of blood.

As officers responded to the upstairs portion of the apartment while still making police announcements, they observed a naked Hispanic male subject lying on top of Yadira Gomez. Verbal commands were given in English and Spanish as the male subject eventually complied and identified as the **DEFENDANT**. Upon further investigation, the victim (Yadira Gomez) suffered multiple stab wounds to the chest area. Officer Bateman further observed several small lacerations to the **DEFENDANT'S** abdomen as he was medically treated.

On 01/30/17, Detective Chad Cox conducted an emergency forensic interview with a juvenile subject identified as [REDACTED]; 9 years of age. It should be noted that Detective Cox attended the Corner House Child Sexual Abuse Forensic Interview Training on September 18, 2009 and have conducted multiple Forensic Interviews since that time. During the course of the investigation it was determined that [REDACTED] attended an elementary school located in Independence, Missouri and disclosed to his teacher that his mother (Yadira Gomez) was dead and his father (**DEFENDANT**) advised that it was an accident.

[REDACTED] further indicated that that he resides with the **DEFENDANT** and Yadira Gomez); along with his brother (“[REDACTED]” Jr.) and his sister (“[REDACTED]”). “[REDACTED]” further indicated that on 01/29/2017, he attended church with his family as his mother (Yadira Gomez) got upset at the **DEFENDANT** for the way that he was acting in church. They all went outside and his parents started to argue in the parking lot. Yadira Gomez then entered into her Chevrolet Trailblazer and departed from the church. “[REDACTED] and his siblings then entered into the **DEFENDANT’S** unknown make/model vehicle with his siblings and departed from the church.

When they arrived to their residence, both the **DEFENDANT** and Yadira Gomez started to fight and were hitting each other. “[REDACTED]” and his siblings went downstairs to the basement and watched shows and colored pictures. [REDACTED] indicated that he could hear his mother (Gomez) tell the **DEFENDANT** that she wanted him to move out of the apartment.

After a while, he heard the **DEFENDANT** yelling “why did I do that and it was really dumb” and he was crying. [REDACTED] went upstairs as the **DEFENDANT** was in the kitchen. He stated that there was blood everywhere in the kitchen. He then went up to his parents room and saw his mother (Gomez) lying on the floor in her bedroom. He stated that she had one eye open and had blood all over her body. He also stated that there was a large knife on the floor next to her. [REDACTED] described the knife as having a black handle and a grey blade. He also stated that his mother (Gomez) was dressed when he initially observed her.

[REDACTED] eventually proceeded back down stairs and drew pictures for his mother (Gomez) because he thought she was dead. [REDACTED] further advised that there was blood all over the house because the **DEFENDANT** walked through the blood as he was walking around. [REDACTED] and [REDACTED] eventually snuck upstairs to check on their mother (Gomez) as the **DEFENDANT** was sleeping in the kitchen. When they arrived upstairs, [REDACTED] touched his mother (Gomez) on the stomach to see if she was breathing but she was not.

They then proceeded back downstairs and stayed down there until 0700 hours and they all got ready for school. When they were ready, he woke up the **DEFENDANT** and asked him to take them to school as he complied with his request while operating the peach colored unknown make/model vehicle. When [REDACTED] arrived to school he advised his teacher as to what had happened.

On 01/30/2017, Spanish Speaking Officer Luis Virgil and Criminal Investigations Unit Detective Brice Minter conducted a recorded interview with the **DEFENDANT** after reading him the Miranda Warning of Rights in Spanish as he agreed to provide a statement without the presence of an attorney.

During the course of the interview, the **DEFENDANT** admitted that his wife (Yadira Gomez) was seeking the attention from another church member identified as [REDACTED]. He further indicated that he remembered arriving to their residence after receiving a counseling session from their Pastor regarding their marriage. He advised that his wife (Gomez) did not arrive to their residence at the same time as he began consuming alcohol. He further indicated that prior Gomez's arrival, he had consumed (2) bottles of Champaign.

As Gomez arrived to the residence, he advised that he did not start an argument and proceeded downstairs and consumed another (6) 16 oz. cans of Budweiser beer. After that, he consumed (1) more bottle of Champaign and "blacked out". He further indicated that at approximately 0800 hours, he woke up and arrived upstairs to the bedroom where he observed Gomez lying on the floor while deceased and her clothing attire still on. He closed the door in order to shield his children from the deceased as he drove his (3) children to their respective schools as he indicated that he was still highly intoxicated.

The **DEFENDANT** arrived back to the residence and consumed numerous unknown pills and more Champaign and indicated that he wanted to end his life. He stated that he retrieved Gomez from off the bedroom floor and placed her into the bed and removed her clothing articles. He indicated that as he removed her clothing articles, he observed that she had sustained more severe wounds prior to his departure but couldn't elaborate. He advised that he does not remember the incident due to him "blacking out", but eluded to the fact that he must have killed her because there was no one else in the residence except his children.

He also alluded to the fact that he had watched several videos of the "Mexican" cartel dismembering body parts from several of their victims as those have been images that he could not release from his memory. As the interview progressed, the **DEFENDANT** still claimed that he had no memory of the incident as he "blacked out". Based on the investigation, the victim (Gomez) sustained approximately (6) gapping stab wounds to the lower portion of her chest, (2) smaller stab wounds to the upper portion of her chest, (1) stab wound to the lower abdomen and (1) stab wound to the lower back area.

During the incident as the **DEFENDANT** was taken into custody, he had a small laceration across the bridge of his nose, several scratches on his wrists, chest and left arm, (5) lacerations across his lower abdomen that appeared to be stab sounds, dried blood on his hands/feet and throughout his body. It should also be noted that as the **DEFENDANT** was seeking medical attention, he admitted to hospital staff that the wounds sustained to his lower abdomen were self-inflicted.

Detective Brice Minter

/s/ Brice Minter

Print Name

Signature

THE COURT FINDS PROBABLE CAUSE:

Date

Judge