

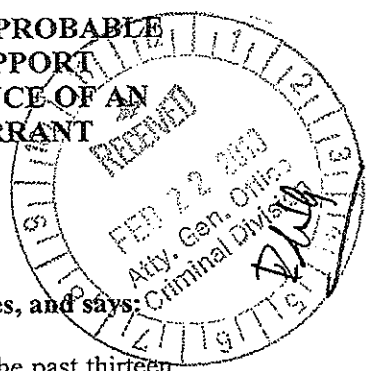
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IN THE SUPERIOR COURT  
FOR THE  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

Commonwealth of the Northern Mariana Islands  
Plaintiff  
VS.  
CRISOSTOMO, Joseph Acosta  
DOB: July 27, 1973 (38 yrs.)  
Defendant

Court Case#.:  
DPS Case# 12-001120

DECLARATION OF PROBABLE  
CAUSE IN SUPPORT  
OF THE ISSUANCE OF AN  
ARREST WARRANT



Affiant, Detective Simon T. Manacop, makes the following declaration, deposes, and says:

Affiant has been a Police Officer for the CNMI Department of Public Safety for the past thirteen years, and is currently assigned to the Commonwealth of the Northern Marianas, Department of Public Safety - Criminal Investigation Bureau under the Special Homicide Activity Resolution Partnership whom investigates any and all criminal violations with special attention to Homicide, Aggravated Assault and Battery, Kidnapping and Missing Person cases. Affiant has participated in numerous criminal investigation activities, and has arrested numerous defendants for the same. Affiant has received and completed law enforcement training from the 17th Cycle Police Academy, Federal Bureau of Investigation, Drug Enforcement Agency, Bureau of Alcohol, Tobacco and Firearms, US Department of Homeland Security, CNMI Attorney General's Office, and the United States Attorney General's Office.

1. On Sunday February 05, 2012 at about 5:49 p.m. Mr. Scott Dotino reported a Missing Person incident at the God Father's Bar in Western Garapan. Officer Jasmine King was dispatched to entertain this incident logged in as **DPS Case# 12-001120**. Mr. Dotino was identified as the Owner of God Fathers Bar and the employer of Mrs. Emerita Relata Romero [hereinafter referred to as ROMERO], Date of Birth: March 29, 1974, a bartender/waitress. He had initially indicated to Officer King that ROMERO was supposed to work at 5:00 pm but has not showed up yet for duty. Mr. Dotino added that it is very suspicious that ROMERO has not report to work as it is very unusual. He tried reaching ROMERO several times thru her cell phone, contact number **670-989-4425**, however she has not responded.
2. Officer King learned that on the early morning of February 05, 2012 at about 2:40 am, ROMERO was identified leaving the bar accompanied by three other employees identified as Natalie Ocon [hereinafter referred to as NATALIE] Melody and Jolens Escamilla. NATALIE was dropped off first at her residence located within the Central Garapan area. As NATALIE was dropped off, she had forgotten a plastic bag filled with Banana's which was in ROMERO'S possession. She called ROMERO and informed her that she will pick up her bananas in a while. NATALIE indicated that she lives a street away from ROMERO whom resides about a block away.

3. NATALIE further stated that as she walked on the street towards ROMERO'S residence, ROMERO was already running towards her with her plastic bag. She appeared in a hurry as she held on to her wallet and cell phone. NATALIE said she then observed a green or blue colored sedan heading south direction along Chichirica Ave. ROMERO signals the sedan to stop and wait for her. She hands the plastic bag to her then walks back towards the sedan and enters from the front passenger side. As ROMERO enters the car, NATALIE hears a male voice asking ROMERO, "WHAT'S THAT?" ROMERO replies, "NOTHING. JUST BANANAS". The vehicle then reverses and proceeds east direction towards Middle Road.
4. On the same day at about 3:00 am, prior to ROMERO being reported missing, Department of Public Safety Dispatch received an emergency call from cell phone number 670-989-4425. The call was initially answered by DPS Dispatcher Loni Perry [hereinafter referred to as PERRY]. PERRY indicated that when she answered the phone call, she overheard a female in the background crying but was not responding to her. As the female spoke, a male voice could also be heard in the background. PERRY described the female voice as being a Filipina and the male voice as being a local. This call lasted for about a minute.
5. As PERRY monitored the phone, she overheard statements from the crying female begging the male to, "PLEASE LET ME GO. MY NECK HURTS". The male calmly speaks and states, "RELAX. RELAX. I'M GONNA TAKE YOU HOME". The male then inquires from the female, "WHAT'S YOUR NAME?", and the female replied, "EMI". PERRY said that she could hear the male repeatedly saying that he was going to take her home. The call was then transferred to another line which Officer Sandy Hambros answered and monitored from there on.
6. Officer Sandy Hambros indicated that when he began monitoring the call, a female was requesting for help and gave the location "MARIANAS RESORT". A static sound followed and the call was cut off. At one point of time the female was overhead asking the male to wait so she could pick up her pants. This was the only information received from the female caller. Cell Phone number 670-989-4425 is assigned to ROMERO.
7. Officer King and Officer Jess Wabol were dispatched to make a routine check in reference to this emergency call. Officer Hambros also responded but were unable to find any disturbance or person in distress within the Marianas Resort. Officer Wabol noted though that as they were exiting the Marpi area just by the intersection that splits to Suicide Cliff and the Marpi landfill, he noticed headlights of a vehicle that was coming out from the direction of the landfill. According to Officer Wabol, he pulled over to the shoulder of the road and waited for the vehicle to exit. As the vehicle came out, it immediately made a left turn and sped up the roadway that leads to the Suicide Cliff and Grotto sites. The vehicle accelerated at a high rate of speed and was unable to be caught up to.
8. During the initial search for ROMERO, Detective Jonathan Decena interviewed Mrs. Esterlita Relata, the cousin of ROMERO, at her residence in Garapan on February 7, 2012. During interview, ESTERLITA confirmed that ROMERO never returned home since the evening of February 4, 2012 when she left for work. ESTERLITA was positive about this because she was awake till 4:00am early Sunday morning, February 5th, and that ROMERO would usually return home before going elsewhere. ESTERLITA mentioned that ROMERO had a violet colored purse, a black wallet with button

containing several assorted credit cards and bank cards. Her cellular phone was described being a Black Berry, Torch model.

9. On Tuesday February 07, 2012 at approximately 2:24pm, Special Agents from the Federal Bureau of Investigation reported to the Department of Public Safety that they located the lifeless body of a female at the abandoned La Fiesta Mall in As Matuis. Your Affiant responded to the location and later met with Special Agent Joe Auther and Haejun Park at the northern most building. Special Agent Auther briefly stated that he and Special Agent Park were searching thru the abandoned La Fiesta Mall when they found the corpse inside a small room that was possibly a restroom.
10. Affiant was escorted by Special Agent Park to the location where the corpse was located. At the scene, Affiant observed a female corpse inside a small room, on the north eastern corner of the abandoned building, formerly the Fiesta 1. Upper portion of the body rested on to the wall as the lower portion of the body lay flat on the concrete floor. Victims head rested facing east direction and the left side of the face parallel to the northern concrete wall. Body fluids covered the immediate surroundings of the corpse. Body was fully clothed with black short pants and gray tank top. Corpse was at an advance state of decomposition as foul odor emitted. Corpse was later transported to the Commonwealth Health Center and officially pronounced dead by Dr. Gregory Kotheimer at 5:33pm.
11. Further processing of the crime scene revealed drag marks that start from the southwest corner of the building, extending north towards the northwest corner, then east towards where the corps was located. Along these drag marks, barefoot prints were found and processed as evidence. Other physical evidence such a palm print with possible blood stain was also recovered on the metal door of the abandoned room that used to be a restroom.
12. On Tuesday February 07, 2012 at 9:52 pm, Dr. Aurelio Espinola, Forensic Pathologist, conducted an Autopsy on the female victim, at the Commonwealth Health Center Morgue. Prior to autopsy, a rape test-kit was administered on the victim where an Oral, Rectum and Vaginal swab samples were collected for analysis purpose. Swelling and contusions were observed on both of the victim's arms, legs and knees. Upon incision it revealed subcutaneous pre-mortem hemorrhage. Victim's eyes were swollen and upon incision revealed pre-mortem hemorrhage that suggests beating. There was a black t-shirt loop-tied tightly around the neck with a square knot on the right side. Upon completion of the Autopsy, Dr. Espinola ruled that the victim came to her death as a result of **Asphyxia due to Ligature Strangulation, a Homicide.**
13. Palm prints were collected from the female victim at the Commonwealth Health Center Morgue after the completion of Autopsy. On Thursday, February 09, 2012 Affiant was advised by Special Agent Joe Auther that the Palm prints collected from the victim was scanned thru the Immigration and Customs Enforcement Finger Print Data Base. Special Agent Auther later received confirmation that the prints collected from the female victim was a positive match/identification to ROMERO.
14. On Wednesday February 08, 2012, at approximately 12:00pm Detective Elias Saralu informed Affiant that he received information in reference to the ROMERO Homicide incident. Affiant was briefed that a Confidential Source informed him that on Saturday evening, February 04, 2012, Joseph Acosta Crisostomo [hereinafter referred to as CRISOSTOMO], was seen operating a dark colored Toyota Yaris or Corolla. The CS

also mentioned that the vehicle appeared to be tinted and was a rent a car. CRISOSTOMO was accompanied by Annie Crisostomo [hereinafter referred to as ANNIE] and Cheyenne Sablan [hereinafter referred to as SABLAN], ANNIE'S boyfriend.

15. On the same day at about 1:20pm, Operatives from the Criminal Investigation Bureau conducted a canvass on all Rent-a-Car companies available on the Island. At about 5:30pm, Affiant was informed by Detective Patrick Sablan that he received a print out list of persons who had rented vehicles recently from Islander Rent a Car located in Dan Dan. The list provided indicate that ANNIE rented a Toyota Corolla (license plate# ACG-246), on February 3, 2012 and exchanged it for another Toyota Corolla (license plate# ACG-236) on February 05, 2012.
16. At about 7:45pm, Affiant arrived at the Islander Rent a Car along Airport Road and met with Mrs. Divina Marilag Marfega [hereinafter referred to as MARFEGA] the operations supervisor. MARFEGA stated that on February 03, 2012 at about 6:30pm, ANNIE arrived at their office and rented a Toyota Corolla, Turquoise color, license plate #ACG-246. On Sunday February 05, 2012, at about 12:30pm, ANNIE came back to their office and requested to have the vehicle changed. MARFEGA did not specify the reason why ANNIE requested for a vehicle change because she was not the person on duty at the time of request. At 8:00pm, MARFEGA gave DPS officers consent to seize and search Vehicle License Plate #ACG-246.
17. The vehicle was transported and secured by Detective Kevin Maratita and FBI Special Agent Haejun Park at 8:25pm at the Boating Safety Hangar located at the Smiling Cove Marina. At about 8:52pm NATALIE was asked to identify the vehicle at the Boating Safety hangar. NATALIE stated that the vehicle was the same type that ROMERO rode in the last time she saw her, but she is not positive of the color.
18. On February 10, 2012 at about 2:25pm, Affiant interviewed Mrs. Editha Vargas [hereinafter referred to as VARGAS] at the Islander Rent A Car. VARGAS stated that on February 03, 2012 at about 6:30pm, the business establishment was already closed when ANNIE and SABLAN arrived and asked to rent a vehicle. They were later given a Turquoise colored Toyota Corolla, License plate #ACG-246.
19. VARGAS recalled that on the morning hours of February 05, 2012, ANNIE arrived at the Office and requested to have her vehicle changed for another tinted vehicle. ANNIE did not specify any reason why she wanted to have the vehicle change. She was later given vehicle license plate# ACG-236. ANNIE also requested to extend rental on the vehicle. VARGAS said that when their maintenance personnel was about to clean the returned vehicle, ACG-246, he noticed that the front passenger floor mat was missing.
20. On February 10, 2012 at approximately 3:19 p.m., Jerry Hodges, a technician from Motorola Guam, extracted the 911 recording registered on February 05, 2012 at approximately 3:01 a.m. The recording was approximately four [4] minutes long and the call was placed using ROMERO'S personal cellular phone [670-989-4425]. On the same night at approximately 7:30 p.m., the Investigators assigned to the case reviewed the recording. It was later determined that the female voice on the recording was that of ROMERO'S. Investigators also claimed that the other individual on the recording, the male voice, sounded similar to be that of CRISOSTOMO'S. This was based on the fact that these Detectives had known CRISOSTOMO through investigating cases and also

because of the fact that CRISOSTOMO had on numerous occasions, been used in conducting Law Enforcement Controlled Narcotic operations.

21. On February 17, 2012 at approximately 1:50 p.m., Detective Elias Saralu brought Ms. Joan Castro [hereinafter referred to as CASTRO] and Mr. Raymond Indalecio [hereinafter be referred to as INDALECIO] to the Criminal Investigations Bureau Office in Capitol Hill to listen to the 911 recording. CASTRO is the ex-common law wife of CRISOSTOMO and INDALECIO is the current boyfriend of CASTRO. Once the recording was played and CASTRO heard the male voice on the recording, CASTRO became upset, claiming she was having goose-bumps on her body. CASTRO'S eyes became watery and without hesitation, CASTRO said she recognized the male's voice to be CRISOSTOMO. When asked whether she was certain, CASTRO claimed she was certain and that she recognized CRISOSTOMO'S voice because she had been with CRISOSTOMO for seventeen years and that whenever CRISOSTOMO would beat her, he would later speak softly to her, to try and calm her.
22. On February 21, 2012 at approximately 6:20 p.m., Drug Enforcement Administration Task Force Custom's Officer John Sablan and DPS Sergeant Paul Ogumoro interviewed a witness identified as Alice Kintaro [hereinafter referred to as KINTARO] at her residence in Upper Miha housing Garapan. KINTARO stated that on the early morning of February 05, 2012 at approximately 1:00 a.m., she was at Piano Poker along middle road Garapan, when Albert Deleon Guerrero [hereinafter referred to as DELEON GUERRERO] along with SABLAN and ANNIE walked into the poker establishment. Piano Poker is within close proximity to where ROMERO was last scene. DELEON GUERRERO told her that CRISOSTOMO was in the parking lot and wanted to meet her. KINTARO mentioned that she had known CRISOSTOMO from her ex-boyfriend whom introduced them. KINTARO further stated that she walked out to the parking lot and entered CRISOSTOMO'S vehicle which she described as a rental vehicle and blue in color.
23. As she entered the vehicle, CRISOSTOMO asked her if she wanted to smoke ICE (Crystal Methamphetamines). Being uncomfortable with the location, she suggested to CRISOSTOMO that they head to her residence in Upper Miha. When they got to her residence, she noticed CRISOSTOMO acting "weird", so she instead asked CRISOSTOMO for ICE to smoke at a later time. CRISOSTOMO then asked to borrow her cellular phone (670-788-5324) and as a friendly gesture she agreed to lend him her cellular phone. At approximately 1:20 a.m., she proceeds back to Piano Poker with CRISOSTOMO.
24. KINTARO left the poker establishment and got home at approximately 1:40 a.m. She further stated that on the same day at approximately 6:00 a.m., CRISOSTOMO called her house telephone (670-233-5324) and asked her if she could go back to Piano poker and picked up DELEON GUERRERO, SABLAN and ANNIE due to that CRISOSTOMO could not pick them up because CRISOSTOMO was busy. She went to Piano Poker and picked up the three and dropped them home. From there on, KINTARO had been calling CRISOSTOMO on her cellular phone (670-788-5324) to return her phone but to no avail. She did not get her cellular phone back until the morning of February 06, 2012 from ANNIE.
25. On February 14, 2012, FBI Special Agents Auther and Todd Price, interviewed CRISOSTOMO at the Department of Correction following his arrest in reference to DPS

Case #12-000318. Upon completion of interview, Agents were able to obtain a water bottle that was used and later discarded by CRISOSTIMO. This Bottle was later sent to the FBI Laboratory located in Quantico Virginia for analysis.

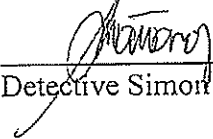
26. On May 18, 2012 Special Agent Haejun Park provided Affiant a Report of Examination done by the FBI Laboratory. Based on the report, Nuclear DNA examinations were conducted on the swab samples obtained from the Vagina of ROMERO during autopsy. The results indicate the presence of DNA from two or more individuals. DNA samples that were obtained from the water bottle used by CRISOSTOMO were compared to the DNA obtained from ROMERO and the results indicate that CRISOSOTOMO'S DNA was potentially a major contributor.
27. A search warrant was subsequently obtained on June 4, 2012 for an Oral DNA Saliva Swab from the body of CRISOSTOMO. Warrant was granted by the Honorable Judge Kenneth L. Govendo. Evidence collected from this search warrant were analyzed and results confirmed CRISOSTOMO being a major donor of DNA which were compared to swab samples obtained from the vagina of ROMERO.
28. On June 01, 2012 an FBI Laboratory analysis on evidence procured from Vehicle license plate# ACG-246, which was processed at the Boating Safety Hangar on February 09, 2012, concluded that a hair strand collected from inside the vehicle was identified as matching hair strands pulled from ROMERO during the autopsy.
29. On June 18, 2012 , an FBI Laboratory analysis on evidence procured from Vehicle license plate # ACG-246, which was processed at the Boating Safety Hangar on February 09, 2012, found that black cotton fibers found in the vacuum sweepings of said vehicle were consistent with originating from the black leggings found around ROMERO's neck that were apparently used to strangle her.

Based on the information contained in paragraphs 1 thru 28, your Affiant believes that probable cause exists to support the charges of **First Degree Murder 6 CMC 1101(a), Kidnapping 6 CMC 1421, Sexual Assault in the First Degree 6 CMC 1301, Robbery 6 CMC 1411, Theft 6 CMC 1601, Assault and Battery 6 CMC 1201 and Disturbing the Peace 6 CMC 3101** in violation of the laws of the **Commonwealth Criminal Code**.

Therefore, your Affiant requests that this court issue an Arrest Warrant for **CRISOSTOMO, Joseph Acosta** for the indicated charges. Affiant also request that bail be set at **NO Bail** as set forth by the Commonwealth Superior Court Bail Schedule.

Affiant **SWEARS UNDER OATH** that the foregoing is true and correct to the best of your Affiant's knowledge, and that this declaration was executed this **22<sup>nd</sup>** day of **February**, 2013 on Saipan, Commonwealth of the Northern Mariana Islands.

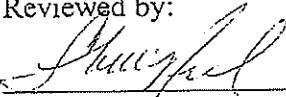
Signature of your Affiant:

  
\_\_\_\_\_  
Detective Simon T. Manacop

2/22/13

\_\_\_\_\_  
Date:

Reviewed by:

  
\_\_\_\_\_  
Prosecutor, Asst. Attorney General

2/22/2013

\_\_\_\_\_  
Date:

  
\_\_\_\_\_  
SUPERIOR COURT JUDGE

IN THE SUPERIOR COURT  
FOR THE  
COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS

RECEIVED  
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J.V.

Commonwealth of the Northern Mariana Islands  
Plaintiff,  
VS.  
CRISOSTOMO, Joseph Acosta  
DOB: July 27, 1973 (39 yrs.)  
Defendant,

Court Case# 13-  
DPS Case# 12-001120

ARREST WARRANT

TO ANY POLICE OFFICER, DETECTIVE, MARSHALL OR ANY PEACE OFFICER IN THE COMMONWEALTH, approved ( ) Oral (X) Written declaration provided before me by Detective Simon T. Manacop on this date, here is an Arrest Warrant issued for the arrest of the above mentioned defendant for the charges of First Degree Murder 6 CMC 1101(a), Kidnapping 6 CMC 1421, Sexual Assault in the First Degree 6 CMC 1301, Robbery 6 CMC 1411, Theft 6 CMC 1601, Assault and Battery 6 CMC 1201 and Disturbing the Peace 6 CMC 3101 in violation of the laws of the Commonwealth Criminal Code.

YOU ARE HEREBY COMMANDED to arrest the above named defendant and to bring him/her before a judge without unnecessary delay.

Bail set at No BAIL

This warrant is issued on this 22nd day of February, 2013 at 9:50 (a.m.)/p.m. in the village of Saipan, Saipan, Commonwealth of the Northern Mariana Islands.

BY THE COURT:  
[Signature]  
SUPERIOR COURT JUDGE

Commonwealth of the Northern Mariana Islands

RETURN OF OFFICER: I hereby certify that I have issued this arrest warrant on the above named defendant at 11:25 a.m./p.m., on the 22nd day of February, 2013 at AGO, SAIPAN. Dated this 22nd day of February, 2013.

[Signature]  
Police Officer