District Court Case No: C-23-377884-1
Related Case A-25-918802-W
Supreme Court Docket No: 91555

Electronically Filed
Mar 16 2026 11:30 AM
Elizabeth A. Brown
Clerk of Supreme Court

IN THE SUPREME COURT OF THE STATE OF NEVADA

RAMSES O. ZAMARRON-ESTRADA,
Appellant(s),

vs.

TERRY ROYAL, WARDEN ESP,
Respondent(s),

RECORD ON APPEAL
VOLUME
1

ATTORNEY FOR APPELLANT
RAMSES ZAMARRON ESTRADA # 1283027,
PROPER PERSON
P.O. BOX 1989
ELY, NV 89301

ATTORNEY FOR RESPONDENT
STEVEN B. WOLFSON,
DISTRICT ATTORNEY
200 LEWIS AVE.
LAS VEGAS, NV 89155-2212

C-23-377884-1 State of Nevada vs Ramses Zamarronestrada

I N D E X

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C-23-377884-1 State of Nevada
vs
Ramses Zamarronestrada

I N D E X

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C-23-377884-1 State of Nevada
vs
Ramses Zamarronestrada

I N D E X

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10/18/2023 1:51 PM
Steven D. Grierson
CLERK OF THE COURT

INFM
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
ERCAN E. ISCAN
Chief Deputy District Attorney
Nevada Bar #009592
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

I.A. 10/19/2023
9:30 AM
COUMOU

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

RAMSES O. ZAMARRON-ESTRADA, #2854368

Defendant.

CASE NO: **C-23-377884-1**

DEPT NO: **III**

I N F O R M A T I O N

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

That **RAMSES O. ZAMARRON-ESTRADA**, as Defendant above named, has committed the crime of **ATTEMPT LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category B Felony - NRS 201.230(2) - NOC 60471)** in the manner following:

That on or between September 23, 2018 and December 31, 2020, at and within the County of Clark, State of Nevada, 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, Defendant did willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit:

//

//

J.T., a child under the age of 14 years, by attempting to use his mouth and/or tongue to touch and/or kiss and/or lick the mouth and/or tongue of J.T., and/or attempt to use his hand(s) and/or finger(s) to touch and/or rub and/or fondle the breast(s) of J.T., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of Defendant, or J.T.

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY */s/ Ercan E. Iscan*
ERCAN E. ISCAN
Chief Deputy District Attorney
Nevada Bar #009592

23CRN000087/hjc/SVU
NLVPD EV#2211160021880

THIS SEALED
DOCUMENT,
NUMBERED PAGE(S)
3 - 128
WILL FOLLOW VIA
U.S. MAIL

Electronically Filed
10/18/2023
CLERK OF THE COURT

JUSTICE COURT, NORTH LAS VEGAS TOWNSHIP

CLARK COUNTY, NEVADA

STATE OF NEVADA, Plaintiff -vs- RAMSES O. ZAMARRONESTRADA, ID #: 2854368 Defendant(s)	)	CASE NO. **23CRN000087-0000** **202300714C** C-23-377884-1

I hereby certify the above and foregoing to be a full, true and correct copy of the proceedings as the same appear in the above entitled matter.

WITNESS MY HAND this date: October 18, 2023.

Natalie L Lynell

JUSTICE OF THE PEACE
NORTH LAS VEGAS TOWNSHIP

JUSTICE COURT, NORTH LAS VEGAS TOWNSHIP

CLARK COUNTY, NEVADA

CASE NO. 23CRN000087-0000
202300714C
C-23-377884-1

STATE OF NEVADA,

Plaintiff

-vs-

RAMSES O. ZAMARRONESTRADA,
ID #: 2854368
Defendant(s)

COMMITMENT
C-23-377884-1
and

ORDER TO APPEAR

An Order having been made this day by me, that RAMSES O. ZAMARRONESTRADA be held to answer upon the charge(s) of:

LEWDNESS W/CHILD UNDER AGE 14, 1ST
LEWDNESS W/CHILD UNDER AGE 14, 1ST
SEXUAL ASSAULT AGAINST CHILD UNDER 14
SEXUAL ASSAULT AGAINST CHILD UNDER 14
SEXUAL ASSAULT AGAINST CHILD UNDER 14
SEXUAL ASSAULT AGAINST CHILD UNDER 14
KIDNAPPING OF MINOR, 1ST DEGREE

committed in said County, on or about the 23rd day of September, 2022.

IT IS FURTHER ORDERED that unless the Defendant(s) have/has been previously released on bail or by order of the Court, that the Sheriff of the County of Clark receive the above named Defendant(s) into custody, and detain such Defendant(s) until such Defendant(s) be legally discharged, and that such Defendant(s) be admitted to bail in the sum of $0.0 Cash or Surety Bond; and

IT IS FURTHER ORDERED that said Defendant(s) is/are commanded to appear in the Eighth Judicial District Court, Clark County Courthouse, Las Vegas, Nevada at 9:30 am on the 19th day of October, 2023 for arraignment and further proceedings on the within charge.

Dated: October 18, 2023

Natalie L. Tyrrell

JUSTICE OF THE PEACE FOR NORTH LAS VEGAS TOWNSHIP

ORIGINAL

JUSTICE COURT, NORTH LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

North Las Vegas Justice Court
FILED IN OPEN COURT
Clerk 10-17-23 Date

Plaintiff,

-vs-

RAMSES O. ZAMARRONESTRADA,
aka, Ramses Zamarron-Estrada #2854368,

Defendant.

JC CASE NO: 23CRN000087

JC DEPT NO: 2

AMENDED

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category A Felony - NRS 201.230 - NOC 50975), SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50105) and FIRST DEGREE KIDNAPPING OF A MINOR (Category A Felony - NRS 200.310, 200.320 - NOC 50053), in the manner following, to wit: That the said Defendant, on or between September 23, 2018 and December 31, 2020, at and within the County of Clark, State of Nevada,

COUNT 1 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

did on or between September 23, 2018 to September 22, 2020, willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit: J.T., a child under the age of fourteen years, by inserting his tongue into the said J.T.'s mouth and kissing her, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or J.T.

COUNT 2 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

did on or between September 23, 2019 to September 22, 2020, willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit: J.T., a child under the age of fourteen years, by touching and/or rubbing and/or fondling the breasts of the said J.T., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or J.T.

COUNT 3 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

did on or between September 23, 2019 to September 22, 2020, willfully, unlawfully, and feloniously commit a sexual penetration upon J.T., a child under the age of 14 years, to wit: anal intercourse, by inserting his penis into the anal opening of the said J.T.

COUNT 4 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

did on or between September 23, 2019 to September 22, 2020, willfully, unlawfully, and feloniously commit a sexual penetration upon J.T.'s, a child under the age of 14 years, to wit: anal intercourse, by inserting his penis into the anal opening of the said J.T.

COUNT 5 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

did on or between September 23, 2018 to December 31, 2020, willfully, unlawfully, and feloniously commit a sexual penetration upon J.T., a child under the age of 14 years, to wit: sexual intercourse, by inserting his penis into the genital opening of the said J.T.

COUNT 6 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

did on or between September 23, 2018 to December 31, 2020, willfully, unlawfully, and feloniously commit a sexual penetration upon J.T., a child under the age of 14 years, to wit: digital penetration, by inserting his finger(s) into the anal opening of the said J.T.

COUNT 7 - FIRST DEGREE KIDNAPPING OF A MINOR

did on or between September 23, 2019 to September 22, 2020, willfully, unlawfully, and feloniously, lead, take, entice, and/or carry away or detain J.T., a minor, with the intent to keep him or her for a protracted period of time or permanently and/or imprison or confine the said J.T., from his or her parents, guardians, or other person or persons having lawful custody of J.T., or with the intent to hold J.T. to unlawful service, or to perpetrate upon the person of J.T. any unlawful act, to wit: by taking the said J.T. to a secured location with intent to commit lewdness and/or sexual assault upon the said J.T.

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.

/s/ Ercan E. Iscan
01/11/23

23CRN000087/sar/SVU
NLVPD EV# 2211160021880
(TK)

JUSTICE COURT, NORTH LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

NORTH LAS ... E COURT

23CRN000087
Dept 2

RAMSES O. ZAMARRON-ESTRADA,
aka, Ramses Zamarron-Estrada #2854368,

Defendant.

DA CASE NO: 202300714C

CRIMINAL COMPLAINT

The Defendant above named having committed the crimes of LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category A Felony - NRS 201.230 - NOC 50975), SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE (Category A Felony - NRS 200.364, 200.366 - NOC 50105) and FIRST DEGREE KIDNAPPING OF A MINOR (Category A Felony - NRS 200.310, 200.320 - NOC 50053), in the manner following, to wit: That the said Defendant, on or between September 23, 2018 and November 1, 2020, at and within the County of Clark, State of Nevada,

COUNT 1 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

did on or between September 23, 2018 to September 27, 2020, willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit: J.T., a child under the age of fourteen years, by inserting his tongue into the said J.T.'s mouth and kissing her, with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or J.T.

COUNT 2 - LEWDNESS WITH A CHILD UNDER THE AGE OF 14

did on or between September 23, 2019 to September 22, 2020, willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit: J.T., a child under the age of fourteen years, by touching and/or rubbing and/or fondling the breasts of the said J.T., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of defendant, or J.T.

COUNT 3 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

did on or between May 20, 2020, to November 1, 2020, willfully, unlawfully, and feloniously commit a sexual penetration upon J.T., a child under the age of 14 years, to wit: anal intercourse, by inserting his penis into the anal opening of the said J.T.

COUNT 4 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

did on or between May 20, 2020, to November 1, 2020, willfully, unlawfully, and feloniously commit a sexual penetration upon J.T.'s, a child under the age of 14 years, to wit: anal intercourse, by inserting his penis into the anal opening of the said J.T.

COUNT 5 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

did on or between May 20, 2020, to November 1, 2020, willfully, unlawfully, and feloniously commit a sexual penetration upon J.T., a child under the age of 14 years, to wit: sexual intercourse, by inserting his penis into the genital opening of the said J.T.

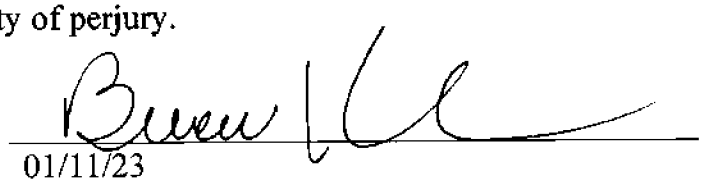
COUNT 6 - SEXUAL ASSAULT WITH A MINOR UNDER FOURTEEN YEARS OF AGE

did on or between May 20, 2020, to November 1, 2020, willfully, unlawfully, and feloniously commit a sexual penetration upon J.T., a child under the age of 14 years, to wit: digital penetration, by inserting his finger(s) into the anal opening of the said J.T.

COUNT 7 - FIRST DEGREE KIDNAPPING OF A MINOR

did on or between May 20, 2020, to November 1, 2020, willfully, unlawfully, and feloniously, lead, take, entice, and/or carry away or detain J.T., a minor, with the intent to keep him or her for a protracted period of time or permanently and/or imprison or confine the said J.T., from his or her parents, guardians, or other person or persons having lawful custody of J.T., or with the intent to hold J.T. to unlawful service, or to perpetrate upon the person of J.T. any unlawful act, to wit: by taking the said J.T. to a secured location with intent to commit lewdness and/or sexual assault upon the said J.T.

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.



01/11/23

/aj
NLVPD EV# 2211160021880
(TK)

JUSTICE COURT. NORTH LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA
DOCKET SHEET...CRIMINAL

CASE # 23CRN000087-0000

State **ZAMARRONESTRADA, RAMSES O.** 2854368 (SCOPE)

DATE, JUDGE, OFFICERS OF COURT PRESENT	PROCEEDINGS APPEARANCES - HEARING	EVENTS
October 17, 2023 N. L. TYRRELL, JUDGE E. ISCAN, DDA F. COUMOU, ESQ FOR O. DE CASTROVERDE, ESQ J. HARRIS, CLERK RECORDED BY JAVS	HEARING HELD DEFENDANT PRESENT IN COURT IN CUSTODY WITH CCDC PER NEGOTIATIONS; DEFENDANT UNCONDITIONALLY WAIVES HIS RIGHT TO A PRELIMINARY HEARING THEREUPON THE COURT ORDERS THE DEFENDANT HELD TO ANSWER TO THE SAID CHARGES IN THE EIGHTH JUDICIAL DISTRICT COURT CCDC $50K SET FOR COURT APPEARANCE Event: DISTRICT COURT ARRAIGNMENT NLV Date: 10/19/2023 Time: 9:30 am Judge: Location: DISTRICT COURT ARRAIGNMENT	DISTRICT COURT ARRAIGNMENT NLV Date: October 19, 2023 Time: 9:30 am Location: DISTRICT COURT ARRAIGNMENT

JUSTICE COURT. NORTH LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA
DOCKET SHEET...CRIMINAL

CASE # 23CRN000087-0000

State **ZAMARRONESTRADA, RAMSES O.** 2854368 (SCOPE)

DATE, JUDGE, OFFICERS OF COURT PRESENT	PROCEEDINGS APPEARANCES - HEARING	EVENTS
September 05, 2023 N. L. TYRRELL, JUDGE T. SHARP, DDA F. COUMOU, ESQ FOR D. DECASTROVERDE, ESQ J. HARRIS, CLERK RECORDED BY JAVS	MOTION CONTINUED DEFENDANT PRESENT IN COURT IN CUSTODY WITH CCDC DEFENSE FILES A MOTION TO REOPEN VALDEZ-JIMENEZ DEFENSE REQUESTS HIGH LEVEL EMP-STATE OBJECTS MOTION CONTINUED FOR STATE TO RESPONED PASSED FOR STATUS CHECK ON STATE'S RESPONSE TO MOTION CCDC $200K SET FOR COURT APPEARANCE Event: MOTIONS NLV Date: 09/11/2023 Time: 8:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2	
September 11, 2023 I. MANINGO, PRO TEM FOR N. L. TYRRELL, JUDGE E. ISCAN, DDA F. COUMOU, ESQ FOR O. DECASTROVERDE, ESQ J. BRELAND, CLERK RECORDED BY JAVS	MOTION GRANTED DEFENDANT PRESENT IN COURT MOTION BY DEFENSE TO REOPEN VALDEZ-JIMENEZ HEARING FILED STATE RESPONDED ORALLY DEFENSE REQUEST TO RELEASE TO EMP - HIGH LEVEL MONITORING - OBJECTION BY STATE - GRANTED BAIL RESET BASED UPON THE ARGUMENT THAT WAS PRESENTED BY THE ATTORNEYS BAIL RESET: $50,000 PLUS EMP - HIGH LEVEL BAIL CONDITION: DEFENDANT TO HAVE NO CONTACT WITH VICTIM: J. T. OR ANY OTHER MINORS PRELIMINARY HEARING STANDS CCDC / $50,000 WITH EMP - HIGH	

JUSTICE COURT. NORTH LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA
DOCKET SHEET...CRIMINAL

CASE # 23CRN000087-0000

State **ZAMARRONESTRADA, RAMSES O.** 2854368 (SCOPE)

DATE, JUDGE, OFFICERS OF COURT PRESENT	PROCEEDINGS APPEARANCES - HEARING	EVENTS
July 18, 2023 N. L. TYRRELL, JUDGE M. GILES, DDA T. SMITH, DPD M. TORRES, SPANISH INTERPRETER A. HILL, CLERK RECORDED BY JAVS	ARRAIGNMENT HEARING HELD DEFENDANT IS PRESENT IN COURT IN CUSTODY WITH NLV PUBLIC DEFENDER IS APPOINTED PRELIMINARY HEARING IS SET NLV $200K SET FOR COURT APPEARANCE Event: PRELIMINARY HEARING NLV Date: 08/01/2023 Time: 9:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2	
August 01, 2023 N. L. TYRRELL, JUDGE M. GILES, DDA R. SAMANO ESQ. FOR O. DECASTROVERDE ESQ. M. BERRY, SPANISH INTERPRETER A. HILL, CLERK RECORDED BY JAVS	PRELIMINARY HEARING CONTINUED - DEFENSE ESQ REQUEST DEFENDANT IS PRESENT IN COURT IN CUSTODY WITH CCDC R. SAMANO ESQ. SUBSTITUTES IN AS ATTORNEY OF RECORD FOR O. DECASTROVERDE ESQ. PRELIMINARY HEARING IS CALLED OFF DEFENSE REQUESTS CONTINUANCE MOTION GRANTED PRELIMINARY HEARING IS RESET CCDC $200K SET FOR COURT APPEARANCE Event: PRELIMINARY HEARING NLV Date: 10/17/2023 Time: 9:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2	
August 31, 2023	SET FOR COURT APPEARANCE Event: MOTIONS NLV Date: 09/05/2023 Time: 8:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2 Result: MOTION CONTINUED	

JUSTICE COURT. NORTH LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA
DOCKET SHEET...CRIMINAL

CASE # 23CRN000087-0000

State **ZAMARRONESTRADA, RAMSES O.** 2854368 (SCOPE)

DATE, JUDGE, OFFICERS OF COURT PRESENT	PROCEEDINGS APPEARANCES - HEARING	EVENTS
July 15, 2023 C. NEWMAN FOR N. L. TYRRELL, JP C. LAURENT, DDA L. AVANTS, DPD M. REHAGEN, CLERK A. HERRERA, SI RECORDED BY JAVS	SET FOR COURT APPEARANCE Event: FELONY ARRAIGNMENT NLV Date: 07/18/2023 Time: 8:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2 Result: ARRAIGNMENT HEARING HELD HEARING HELD Defendant PRESENT in NLV custody with the assistance of a Spanish interpreter (Booked on warrant of arrest) Valdez-Jimenez hearing heard State requests a $250,000 bail setting with high level electronic monitoring and a no contact order with the victim or any minors. These are extremely violent and troubling allegations. He preyed upon the victim on multiple occasions. He is facing a possible life sentence. He is a danger to the community and a flight risk. Defense requests a low bail setting or electronic monitoring. Defendant has no criminal history. He is not a flight risk. Defense was unable to interview the Defendant due to the language barrier. Defense is unsure of Defendant's employment or contacts with the community. Per Court, the Parties may readdress bail in the future. Court has sufficient information for the bail hearing. Court finds the Defendant to be a danger to the community. Bail Set: $200,000 total bail with high level electronic monitoring. Court admonishes the Defendant to have no contact with the victim or any minors and to stay away from the victim's residence. PASSED for initial arraignment Defendant remanded to CCDC CCDC/$200,000 total bail with EMP HIGH (no contact/stay away)	

JUSTICE COURT. NORTH LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA
DOCKET SHEET...CRIMINAL

CASE # 23CRN000087-0000

State **ZAMARRONESTRADA, RAMSES O.** 2854368 (SCOPE)

DATE, JUDGE, OFFICERS OF COURT PRESENT	PROCEEDINGS APPEARANCES - HEARING	EVENTS
January 23, 2023	ALERT INFORMATION ARREST WARRANT - CRIMINAL issued on: 01/23/2023 For: ZAMARRONESTRADA, RAMSES O. Bond Amt: $ NO BAIL Complaint FILED. Upon Motion by State, Arrest Warrant ISSUED. BAIL SET. ARREST WARRANT - CRIMINAL created on: 01/23/2023 For: ZAMARRONESTRADA, RAMSES O. Bond Amt: $ 0.00	
July 14, 2023	ALERT INFORMATION ARREST WARRANT - CRIMINAL served on: 07/13/2023 For: ZAMARRONESTRADA, RAMSES O. SET FOR COURT APPEARANCE Event: PRETRIAL CUSTODY STATUS HEARING NLV Date: 07/15/2023 Time: 8:00 am Judge: HARRIS, BELINDA T Location: DEPARTMENT 3 Result: CRIMINAL HEARING HELD	

JUSTICE COURT. NORTH LAS VEGAS TOWNSHIP
CLARK COUNTY, NEVADA
DOCKET SHEET...CRIMINAL

CASE # 23CRN000087-0000

State **ZAMARRONESTRADA, RAMSES O.** 2854368 (SCOPE)

Charge(s)			
	KIDNAPPING OF MINOR, 1ST DEGREE	BOUND OVER	
	SEXUAL ASSAULT AGAINST CHILD UNDER 14	BOUND OVER	(4 counts)
	LEWDNESS W/CHILD UNDER AGE 14, 1ST	BOUND OVER	(2 counts)

Conditions

Description	Required Amount	Bal Due	Due Dt	Notes

LINKED CASES FOR: 23CRN000087-0000

CASE #	STATUS	EVENT DATE	EVENT DESCRIPTION
		NO FUTURE EVENTS	

DATE, JUDGE, OFFICERS OF COURT PRESENT	PROCEEDINGS APPEARANCES - HEARING	EVENTS
September 23, 2022	BAIL AMOUNT Charge #3: SEXUAL ASSAULT AGAINST CHILD UNDER 14	
	BAIL AMOUNT Charge #6: SEXUAL ASSAULT AGAINST CHILD UNDER 14	
	BAIL AMOUNT Charge #5: SEXUAL ASSAULT AGAINST CHILD UNDER 14	
	BAIL AMOUNT Charge #1: LEWDNESS W/CHILD UNDER AGE 14, 1ST	
	BAIL AMOUNT Charge #4: SEXUAL ASSAULT AGAINST CHILD UNDER 14	
	BAIL AMOUNT Charge #2: LEWDNESS W/CHILD UNDER AGE 14, 1ST	
	BAIL AMOUNT Charge #7: KIDNAPPING OF MINOR, 1ST DEGREE	
January 17, 2023	COMPLAINT SWORN TO AND FILED:	

pg 26

FILED IN OPEN COURT
STEVEN D. GRIERSON
CLERK OF THE COURT
OCT 19 2023
BY, SAMANTHA ALBRECHT, DEPUTY

GPA
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
ERCAN E. ISCAN
Chief Deputy District Attorney
Nevada Bar #009592
200 Lewis Avenue
Las Vegas, NV 89155-2212
(702)671-2500
Attorney for Plaintiff

DISTRICT COURT
CLARK COUNTY, NEVADA

C-23-377884-1
GPA
Guilty Plea Agreement
5051958

THE STATE OF NEVADA,

Plaintiff,

-vs-

RAMSES O. ZAMARRON-ESTRADA, #2854368

Defendant.

CASE NO: **C-23-377884-1**

DEPT NO: **III**

GUILTY PLEA AGREEMENT

I hereby agree to plead guilty, pursuant to North Carolina v. Alford, 400 U.S. 25 (1970), to: **ATTEMPT LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category B Felony - NRS 201.230(2) - NOC 60471)** as more fully alleged in the charging document attached hereto as Exhibit "1".

My decision to plead guilty is based upon the Alford plea agreement in this case which is as follows:

The State will make no recommendation at the rendition of sentence. All remaining counts contained in the Criminal Complaint which were bound over to District Court shall be dismissed when I am adjudged guilty and sentenced.

I agree to the forfeiture of any and all electronic storage devices, computers, and/or related equipment and/or weapons or any interest in any electronic storage devices, computers and/or related equipment and/or weapons seized and/or impounded in connection with the instant case and/or any other case negotiated in whole or in part in conjunction with this plea agreement.

I understand and agree that, if I fail to interview with the Department of Parole and Probation (P&P), fail to appear at any subsequent hearings in this case, or an independent magistrate, by affidavit review, confirms probable cause against me for new criminal charges including reckless driving or DUI, but excluding minor traffic violations, the State will have the unqualified right to argue for any legal sentence and term of confinement allowable for the crime(s) to which I am pleading guilty, including the use of any prior convictions I may have to increase my sentence as an habitual criminal to five (5) to twenty (20) years, Life without the possibility of parole, Life with the possibility of parole after ten (10) years, or a definite twenty-five (25) year term with the possibility of parole after ten (10) years.

Otherwise I am entitled to receive the benefits of these negotiations as stated in this plea agreement.

CONSEQUENCES OF THE PLEA

By pleading guilty pursuant to the Alford decision, it is my desire to avoid the possibility of being convicted of more offenses or of a greater offense if I were to proceed to trial on the original charge and of also receiving a greater penalty. I understand that my decision to plead guilty by way of the Alford decision does not require me to admit guilt, but is based upon my belief that the State may present sufficient evidence at trial that a jury may return a verdict of guilty of a greater offense or of more offenses than that to which I am pleading guilty.

I understand that in pleading guilty by way of the Alford decision, I am not contesting the facts, which the State asserts, support all the elements of the offense to which I now plead as set forth in Exhibit "1."

I understand that as a consequence of my plea of guilty by way of the Alford decision the Court must sentence me to imprisonment in the Nevada Department of Corrections for a minimum term of not less than two (2) years and a maximum term of not more than twenty (20) years. The minimum term of imprisonment may not exceed forty percent (40%) of the maximum term of imprisonment. I understand that, if appropriate, I will be ordered to make restitution to the victim of the offense to which I am pleading guilty and to the victim of any

related offense which is being dismissed or not prosecuted pursuant to this agreement. I will also be ordered to reimburse the State of Nevada for any expenses related to my extradition, if any. I understand that the law requires me to pay an Administrative Assessment Fee.

I understand that pursuant to NRS 176.139 and my plea of guilty to a sexual offense for which the suspension of sentence or the granting of probation is permitted, P&P shall arrange for a psychosexual evaluation as part of the Division's presentence investigation and report (PSI) to the court.

I understand that I am not eligible for probation pursuant to NRS 176A.110 unless the psychosexual evaluation certifies that I do not represent a high risk to reoffend based upon a currently accepted standard of assessment. I understand that, except as otherwise provided by statute, the question of whether I receive probation is in the discretion of the sentencing judge.

I understand that, before I am eligible for parole a panel consisting of the Administrator of the Mental Health and Developmental Services of the Department of Human Resources or his designee; the Director of the Department of Corrections or his designee; and a psychologist licensed to practice in this state or a psychiatrist licensed to practice medicine in this state certifies that I was under observation while confined in an institution of the department of corrections and that I do not represent a high risk to reoffend based upon a currently accepted standard of assessment.

I understand that, pursuant to NRS 176.0931, the Court must include as part of my sentence, in addition to any other penalties provided by law, a special sentence of lifetime supervision commencing after any period of probation or any term of imprisonment and period of release upon parole.

I understand that the Court will include as part of my sentence, in addition to any other penalties provided by law, pursuant to NRS 179D.441 to 179D.550, inclusive, I must register as a sex offender within forty-eight (48) hours of release from custody onto probation or parole.

I understand that I must submit to blood and/or saliva tests under the direction of P&P to determine genetic markers and/or secretor status.

//

I understand that information regarding charges not filed, dismissed charges, or charges to be dismissed pursuant to this agreement may be considered by the judge at sentencing.

I have not been promised or guaranteed any particular sentence by anyone. I know that my sentence is to be determined by the Court within the limits prescribed by statute.

I understand that if my attorney or the State of Nevada or both recommend any specific punishment to the Court, the Court is not obligated to accept the recommendation.

I understand that if the State of Nevada has agreed to recommend or stipulate a particular sentence or has agreed not to present argument regarding the sentence, or agreed not to oppose a particular sentence, such agreement is contingent upon my appearance in court on the initial sentencing date (and any subsequent dates if the sentencing is continued). I understand that if I fail to appear for the scheduled sentencing date or I commit a new criminal offense prior to sentencing the State of Nevada would regain the full right to argue for any lawful sentence.

I understand if the offense to which I am pleading guilty to was committed while I was incarcerated on another charge or while I was on probation or parole that I am not eligible for credit for time served toward the instant offense.

I understand that if I am not a United States citizen, any criminal conviction will likely result in serious negative immigration consequences including but not limited to:

1. The removal from the United States through deportation;
2. An inability to reenter the United States;
3. The inability to gain United States citizenship or legal residency;
4. An inability to renew and/or retain any legal residency status; and/or
5. An indeterminate term of confinement, with the United States Federal Government based on my conviction and immigration status.

Regardless of what I have been told by any attorney, no one can promise me that this conviction will not result in negative immigration consequences and/or impact my ability to become a United States citizen and/or a legal resident.

//

I understand that P&P will prepare a report for the sentencing judge prior to sentencing. This report will include matters relevant to the issue of sentencing, including my criminal history. This report may contain hearsay information regarding my background and criminal history. My attorney and I will each have the opportunity to comment on the information contained in the report at the time of sentencing. Unless the District Attorney has specifically agreed otherwise, then the District Attorney may also comment on this report.

WAIVER OF RIGHTS

By entering my plea of guilty, I understand that I am waiving and forever giving up the following rights and privileges:

1. The constitutional privilege against self-incrimination, including the right to refuse to testify at trial, in which event the prosecution would not be allowed to comment to the jury about my refusal to testify.

2. The constitutional right to a speedy and public trial by an impartial jury, free of excessive pretrial publicity prejudicial to the defense, at which trial I would be entitled to the assistance of an attorney, either appointed or retained. At trial the State would bear the burden of proving beyond a reasonable doubt each element of the offense charged.

3. The constitutional right to confront and cross-examine any witnesses who would testify against me.

4. The constitutional right to subpoena witnesses to testify on my behalf.

5. The constitutional right to testify in my own defense.

6. The right to appeal the conviction with the assistance of an attorney, either appointed or retained, unless specifically reserved in writing and agreed upon as provided in NRS 174.035(3). I understand this means I am unconditionally waiving my right to a direct appeal of this conviction, including any challenge based upon reasonable constitutional, jurisdictional or other grounds that challenge the legality of the proceedings as stated in NRS 177.015(4). However, I remain free to challenge my conviction through other post-conviction remedies including a habeas corpus petition pursuant to NRS Chapter 34.

VOLUNTARINESS OF PLEA

I have discussed the elements of all of the original charge against me with my attorney and I understand the nature of the charge against me.

I understand that the State would have to prove each element of the charge against me at trial.

I have discussed with my attorney any possible defenses, defense strategies and circumstances which might be in my favor.

All of the foregoing elements, consequences, rights, and waiver of rights have been thoroughly explained to me by my attorney.

I believe that pleading guilty and accepting this plea bargain is in my best interest, and that a trial would be contrary to my best interest.

I am signing this agreement voluntarily, after consultation with my attorney, and I am not acting under duress or coercion or by virtue of any promises of leniency, except for those set forth in this agreement.

I am not now under the influence of any intoxicating liquor, a controlled substance or other drug which would in any manner impair my ability to comprehend or understand this agreement or the proceedings surrounding my entry of this plea.

My attorney has answered all my questions regarding this guilty plea agreement and its consequences to my satisfaction and I am satisfied with the services provided by my attorney.

DATED this 19 day of October, 2023.

RAMSES O. ZAMARRON-ESTRADA
Defendant

AGREED TO BY:

ERCAN E. ISCAN
Chief Deputy District Attorney
Nevada Bar #009592

CERTIFICATE OF COUNSEL:

I, the undersigned, as the attorney for the Defendant named herein and as an officer of the court hereby certify that:

1. I have fully explained to the Defendant the allegations contained in the charge to which guilty pleas are being entered.

2. I have advised the Defendant of the penalties for each charge and the restitution that the Defendant may be ordered to pay.

3. I have inquired of Defendant facts concerning Defendant's immigration status and explained to Defendant that if Defendant is not a United States citizen any criminal conviction will most likely result in serious negative immigration consequences including but not limited to:

   a. The removal from the United States through deportation;

   b. An inability to reenter the United States;

   c. The inability to gain United States citizenship or legal residency;

   d. An inability to renew and/or retain any legal residency status; and/or

   e. An indeterminate term of confinement, by with United States Federal Government based on the conviction and immigration status.

   Moreover, I have explained that regardless of what Defendant may have been told by any attorney, no one can promise Defendant that this conviction will not result in negative immigration consequences and/or impact Defendant's ability to become a United States citizen and/or legal resident.

4. All pleas of guilty offered by the Defendant pursuant to this agreement are consistent with the facts known to me and are made with my advice to the Defendant.

5. To the best of my knowledge and belief, the Defendant:

   a. Is competent and understands the charges and the consequences of pleading guilty as provided in this agreement,

   b. Executed this agreement and will enter all guilty pleas pursuant hereto voluntarily, and

   c. Was not under the influence of intoxicating liquor, a controlled substance or other drug at the time I consulted with the Defendant as certified in paragraphs 1 and 2 above.

Dated: This 19 day of October, 2023

FRANK COUMOU, ESQ.

hjc/SVU

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Steven D. Grierson
CLERK OF THE COURT

INFM
STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565
ERCAN E. ISCAN
Chief Deputy District Attorney
Nevada Bar #009592
200 Lewis Avenue
Las Vegas, Nevada 89155-2212
(702) 671-2500
Attorney for Plaintiff

I.A. 10/19/2023
9:30 AM
COUMOU

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

RAMSES O. ZAMARRON-ESTRADA, #2854368

Defendant.

CASE NO: **C-23-377884-1**

DEPT NO: **III**

INFORMATION

STATE OF NEVADA)
) ss.
COUNTY OF CLARK)

STEVEN B. WOLFSON, District Attorney within and for the County of Clark, State of Nevada, in the name and by the authority of the State of Nevada, informs the Court:

That **RAMSES O. ZAMARRON-ESTRADA**, as Defendant above named, has committed the crime of **ATTEMPT LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category B Felony - NRS 201.230(2) - NOC 60471)** in the manner following:

That on or between September 23, 2018 and December 31, 2020, at and within the County of Clark, State of Nevada, 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, Defendant did willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon or with the body, or any part or member thereof, of a child, to wit:

//

//

EXHIBIT "1"

J.T., a child under the age of 14 years, by attempting to use his mouth and/or tongue to touch and/or kiss and/or lick the mouth and/or tongue of J.T., and/or attempt to use his hand(s) and/or finger(s) to touch and/or rub and/or fondle the breast(s) of J.T., with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of Defendant, or J.T.

STEVEN B. WOLFSON
Clark County District Attorney
Nevada Bar #001565

BY */s/ Ercan E. Iscan*
ERCAN E. ISCAN
Chief Deputy District Attorney
Nevada Bar #009592

23CRN000087/hjc/SVU
NLVPD EV#2211160021880

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Steven D. Grierson
CLERK OF THE COURT

MOT

Orlando De Castroverde
Nevada Bar No. 7320
1149 South Maryland Pkwy
Las Vegas, NV 89104
Tel: 702.383.0606
Attorneys for Defendant

EIGHT JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA, Plaintiff, vs. RAMSES ZAMARRON ESTRADA, Defendant	Case No.: 23CRN000087-0000 **MOTION TO RESET BAIL DEPT. III**

Comes Now, Ramses Zamarron Estrada, by and through his Attorney Orlando De Castroverde hereby files this Motion to Reset Bail in the above-entitled case. This Motion is based and made upon the attached Points and Authorities and all papers and documents on file herein.

POINTS AND AUTHORITIES

STATEMENT OF FACTS

Defendant Ramses Zamarron Estrada initially was detained at the Clark County Detention Center charged with two counts of Lewdness with a Child under the Age of 14 and several counts of Sexual Assault against Child under the Age of 14. The allegations surfaced on or about November 2022, but the allegations relate to alleged events dating back to 2020. (*See* attached Exhibit A).

Defendant was arrested on an arrest warrant and appeared before Judge Pro Tempore C. Newman on July 15, 2023. Pro Temp Judge Newman held a Valdez-Jimenez hearing and set the bail at $200,000 and ordered high-level electronic monitoring. The court minutes reflect that his court-appointed attorney at the time did not interview Defendant due to "language barrier." (*See* attached Exhibit B, 7-15-23 entry titled "Hearing Held"). The court attorney admitted that he was unsure of Defendant's employment or contacts with the community. The allegations made by the State's attorney were never refuted. Judge Newman stated that the parties may readdress bail in the future. (*See*, Supra).

Undersigned filed a motion to Reopen the Valdez Jimenez Hearing. After argument by all parties, Judge Pro Tempore Yvette Maningo reset the bail at $50,000 plus high-level electronic monitoring. Unfortunately, Defendant and his family do not have the financial means to post the bail bond.

Defendant appeared in-custody at his preliminary hearing. The State presented an offer of Attempt Lewdness on a Minor under 14 years of Age and will make no recommendation at sentencing. This offer is a significant reduction from the original charges. Defendant agreed to accept the offer and now has pled to the amended charge pursuant to North Carolina v. Alford. Defendant now files this motion requesting that his custody status be heard.

ARGUMENT

Nevada Revised Statute 178.4851 states that a:

> court shall only impose bail or a condition of release, or both, on a person as it deems to be the least restrictive means necessary to protect the safety of the community or to ensure that the person will appear at all times and places ordered by the court, with regard to the factors set forth in NRS 178.4853 and 178.4983. Such conditions of release may include, without limitation:

(a) Requiring the person to remain in this State or a certain county within this State;

(b) Prohibiting the person from contacting or attempting to contact a specific person or from causing or attempting to cause another person to contact that person on the person's behalf;

(c) Prohibiting the person from entering a certain geographic area;

(d) Prohibiting the person from possessing a firearm during the pendency of the case; or

(e) Prohibiting the person from engaging in specific conduct that may be harmful to the person's own health, safety or welfare, or the health, safety or welfare of another person.

2. A prosecuting attorney may request that a court impose bail or a condition of release, or both, on a person. If the request includes the imposition of bail, the prosecuting attorney must prove by clear and convincing evidence that the imposition of bail is necessary to protect the safety of the community or to ensure that the person will appear at all times and places ordered by the court, with regard to the factors set forth in NRS 178.4853 and 178.498.

3. If a court imposes bail or any condition of release, or both, other than release on recognizance with no other conditions of release, the court shall make findings of fact for such a determination and state its reasoning on the record, and, if the determination includes the imposition of a condition of release, the findings of fact must include why the condition of release constitutes the least restrictive means necessary to protect the safety of the community or to ensure that the person will appear at the times and places ordered by the court.

Additionally, NRS 178.4853 lists out certain factors a court must consider in reviewing an individual's custody status:

1. The length of residence in the community;
2. The status and history of employment;
3. Relationships with the person's spouse and children, parents or other family members and with close friends;
4. Reputation, character and mental condition;
5. Prior criminal record, including, without limitation, any record of appearing or failing to appear after release on bail or without bail;
6. The identity of responsible members of the community who would vouch for the reliability of the person;
7. The nature of the offense with which the person is charged, the apparent probability of conviction and the likely sentence, insofar as these factors relate to the risk of not appearing;
8. The nature and seriousness of the danger to the alleged victim, any other person or the community that would be posed by the person's release;
9. The likelihood of more criminal activity by the person after release; and
10. Any other factors concerning the person's ties to the community or bearing on the risk that the person may willfully fail to appear.

The Nevada Supreme Court in Valdez-Jimenez v. the Eighth Judicial District Court, 136 Nev. Advance Op. (2020), held that:

> (w)hen bail is set at an amount greater than necessary to serve the purpose of bail, it effectively denies the defendant his or her rights under the Nevada Constitution to be bailable by sufficient sureties and for bail not to be excessive. Thus, bail may be imposed only where it is necessary to reasonably ensure the defendant's appearance at court proceedings or to protect the community, including the victim and the victim's family. Because of the important liberty interest at stake when bail has the effect of detaining an individual pending trial, we hold that a defendant who remains in custody after arrest is entitled to an individualized hearing at which the State must prove by clear and convincing evidence that bail, rather than less restrictive conditions, is necessary to ensure the defendant's appearance at future court proceedings or to protect the safety of the community, and the district court must state in its findings and reasons for the bail decision on the record.

It should be noted that Judge Newman never explained his findings and reasons when he set the extraordinarily high bail amount along with electronic monitoring. Defendant cannot, and never will, be able to achieve this bail amount even when reset by Pro Temp Judge Maningo.

At the prior hearings, the State made allegations that the acts were "extremely violent and troubling" and that Defendant "preyed upon the victim on multiple occasions." (*See*, Supra). In reading Detective A. Rosenthal's Affidavit for Arrest Warrant, the alleged victim never stated she was being preyed upon or that Defendant had been physically violent. Instead, this case is a typical situation where an allegation of improper conduct is made but where there is no corroborating evidence. There is absolutely no scientific evidence or eyewitness testimony that these assaults occurred. The affidavit does reference that an older sister named Perla repeated an unverified hearsay statement regarding Defendant and his natural daughter, and this older sister also claims that she saw Defendant enter a room where the alleged victim may have been staying. However, the Detective did not follow-up with details that the older sister suspected

that something bad happened to her younger sister. Defendant is adamant that he never closed any door to be alone with the alleged victim.

Troubling, the affidavit fails to note that there were other adults living at this home. Defendant is surprised that the report fails to mention the husband of older sister Perla, named Kevin, who always was present at the home. Additionally, the victim had a brother named Alfonso, who also was always present with his husband. Most of the time, Defendant was out working alongside the mother of the alleged victim named Maria.

Defendant also has long ties to the Las Vegas area. Defendant has lived in the Las Vegas area for the past 12-years and has lived in the United States for the past 17-years. He has one daughter, who was born in the United States named Amaris, who lives in Arizona. Defendant has family in Mexico, but he also has a brother living in Kansas. At the time of the arrest, Defendant was renting a room at a house on the corner of Easter and Palm Vista. He has worked odd jobs in the construction industry as a handyman and as an auto repairman specializing in painting cars. If released, he plans on returning to work as a handyman or returning to employment with his former boss, Dwaynne Johnson.

Defendant has been in a long-term relationship with a lady named Maria Soto. If allowed to be released, he can live with his girlfriend at 2746 Jennydiane Dr., Apt. D. 89121.[1] There are no minors living at this latter address. This Court should note that Defendant was very active in his church community and attends regularly at "Communidad Cristiana Ven y Ve." He has volunteered at this and other churches and has a friendship with a Pastor named Cesar Martinez.

Finally, Defendant was interviewed by the jail for the Nevada Pretrial Risk Assessment. Defendant scored a "1" on the assessment and deemed "low risk". Due to the charges contained in the criminal complaint contained several Category A felonies, the assessment recommended to override and opined to deem Defendant a "Moderate" risk. (*See* attached Exhibit C). Defendant now has pled to a probationable Category B felony, and his custody status needs to be revisited as he still has the high bail set by the prior Pro Temp Judge based on the original charges.

In all, Defendant requests that his bail be reduced or alternatively be placed on high-level electronic monitoring.

Dated this 26th day of October, 2023

By: //S// Frank Coumou
Frank Coumou
Nevada Bar No. 4577
Vilma Nunez
Nevada Bar No. 15446
Orlando De Castroverde
Nevada Bar No. 7320
Attorneys for Defendant

RECEIPT OF COPY

RECEIPT OF COPY of MOTION TO RESET BAIL is acknowledged this _____ day of October, 2023.

_____
DISCTRICT ATTORNEY

CERTIFICATE OF SERVICE

I hereby certify that a copy of MOTION TO RESET BAIL Dept. III was served on the North Las Vegas Justice Court (Criminal Division) via fax at:

(702) 455-1361 by:

BY: */s/ Vanessa Meza* _____
Legal Assistant at De Castroverde Law Group

EXHIBIT A

AFFIDAVIT 2211160021880

State of NEVADA)
) ss:
County of Clark)

Detective A. Rosenthal, P#1947, being first duly sworn, deposes and says:

That he is a Police Detective with the North Las Vegas Police Department, City of North Las Vegas, County of Clark, State of Nevada, being so employed for a period of 16 years, assigned to investigate the crime(s) of **Sexual Assault with a Child Less than 14 years of age and Lewdness with a Minor Less than 14 years of age**, committed on or about November 01, 2020, which investigation has developed **Ramses Zamarron-Estrada** as the perpetrator(s) thereof.

That Affiant developed the following facts in the course of the investigation of said crime, to wit: **Primary Information** - The original reporting officer and responding patrol officers were dispatched to Fitzgerald Elementary School (2650 Revere, NLVN) on 11/16/22 regarding the disclosure of sexual abuse by the 11 year old female Victim. The Victim disclosed to Outcry 1 at school, and alleged the Mother of Victim had a friend/roommate (Suspect) stay at their residence during 2020. The Victim claimed the Suspect would commit lewd acts and sexual assaulted her on several occasions during this time. The sexual abuse took place at both 2716 Shield in North Las Vegas, and 2726 Englestad St, in North Las Vegas. The Suspect no longer lives with the Victim's mother.

Officers Involved: Ofc. A. Zarate, P#2846 (Original reporting officer), Ofc. Walch, P#2424 - responding patrol officer, Ofc. Rigsby, P#2543 - responding patrol officer, Det. A. Rosenthal, P#1947 - (Investigating Detective).

Suspect: Zammaron-Estrada, Ramses - DOB: 03/26/1982 (Suspect)
Victim: Torres-Diaz, Josephine - DOB: 09/23/2011 (Victim), 2716 Shield, NLVN 89030.

Witnesses/Others: Montes, Melissa - Fitzgerald Elementary School Counselor (Outcry 1), Diaz-Llama, Maria De La Cruz - DOB:08/22/1979 (Mother of Victim / Outcry 2), Llamas-Diaz, Perla - DOB: 10/24/1993 (Sister of Victim / Outcry 3), Elizabeth Espinoza - SNCAC (Forensic Interviewer)

Details of Probable Cause: The Original Reporting Officer and responding patrol

officers were dispatched to Fitzgerald Elementary School (2650 Revere, NLVN) on 11/16/22 regarding the disclosure of sexual abuse by the 11 year old female Victim. The Victim disclosed to Outcry 1 at school, and alleged the Mother of Victim had a friend/roommate (Suspect) stay at their residence during 2020.

Outcry 1 told the Original Reporting Officer that she was approached by the Victim at lunch and asked if she could speak privately. Once in private, the Victim told Outcry 1 that she was sexually assaulted a number of different times by the Suspect. The Victim identified the Suspect as a man her mother knew, who stayed at their residence (2716 Shield, NLVN) for approximately six months in the year 2020. The Victim stated that the Suspect did inappropriate things to her at this time, to include being kissed on the lips by the Suspect, having her vagina touched by the Suspect, and the Suspect attempting to penetrate her vagina with his penis. After the sexual abuse took place, the Victim's Mother noticed a change in the Victim's behavior and confronted her. The Victim disclosed the abuse to her Mother, at which time the Suspect was kicked out of the house by the Victim's Mother. The Victim has not seen the Suspect since.

The Victim had made outcries to not only her mother, but her sister as well (Outcry 3)

Officers interviewed Outcry 3, who stated that she was aware that something had happened to the Victim about 2 years ago with the Suspect, who was staying with them at the time. Outcry 3 stated Ramses stayed at the residence with them for about six months until he abruptly left. The Victim's Mother had told her that the Suspect had touched the Victim's butt over her clothes, and that was the reason why she kicked him out. Outcry 3 told police the Suspect was always playing with them and never noticed if the Suspect touched the Victim inappropriately. She observed a few times that the Suspect would enter the room where the Victim was, and locked the door. Outcry 3 did not like that, and she would take the Victim out of the room. Outcry 3 stated that the Suspect had told her about his previous relationship. The Suspect stated that he is not able to see his own daughter because his ex-wife is crazy and accused him of sexual assaulting his daughter.

After the disclosures made by the Victim, Affiant scheduled a Forensic Interview (FI) at the Southern Nevada Children's Advocacy Center - SNCAC (701 N Pecos #K, LVN) on

12/08/22. A forensic interview of a child is a developmentally sensitive and legally sound method of gathering information regarding allegations of abuse and/or exposure to violence. This interview is conducted by a neutral professional utilizing research and practice-informed techniques as part of a larger investigative process. The Victim was interviewed by Elizabeth Espinoza, and Affiant observed the FI remotely on audio/video monitors.

During the FI, the Victim disclosed of six separate detailed incidents of sexual abuse by the Suspect. Although the Victim said that the abuse occurred additional times and estimated the sexual abuse taking place up to twenty separate times, these were the six incidents given in great detail by the Victim.

Incident #1 (2304 E Oakey): The Victim disclosed she was at the Suspect's old residence (identified as 2304 E Oakey, LVN using online investigative research methods), prior to him moving in with them at 2716 Shield. The Victim stated she was in 3rd grade, either 7 or 8 years old at the time. The Victim said she, her Mother, and brother went over to the Suspect's house to use his pool. The Victim's Mother and brother left for a few minutes to run to the store. The Victim stated she was sitting at the edge of the pool when her mother and brother went to the store. The Suspect was already in the pool, grabbed both of the Victim's arms and pulled her into the pool, at which time the Suspect wrapped his legs around the Victim, and pulled her into him. The Suspect then kissed the Victim on the lips. The Victim recalled the Suspect putting his tongue in her mouth, and it lasted about five seconds. The Victim stated, "When he kissed me, he put both of his arms on my shoulder, kind of massaging them. One of his hands was then around my waist. I had my eyes closed. I could feel his nose touch mine. His tongue was in my mouth and his lips on mine. Like a "french kiss." It made me feel uncomfortable, sad. I kind of barely knew the man."

The Victim said she remembers the Suspect wearing an orange shirt and black shorts in the pool. After kissing the Victim, she pulled away from him and threatened to kill the Victim's mother if she told anyone.

After hearing the above disclosure, Affiant determined there was probable cause to charge the Suspect with **1 count of lewdness with a minor - less than 14 years of age.**

Incident #2 (2716 Shield): The Victim disclosed on an incident of sexual abuse which took place inside her bedroom located at 2716 Shield. The Victim stated she was 8 years old at the time, and the Suspect was living at her house at the time. The Victim stated she was getting out of the shower before bedtime. The Victim said, "My chest was growing at the time. I was putting on my bra and he (Suspect) knocked on the door. I told him to give me a second." The Victim said the Suspect opened the door anyway before she could reach the lock on the door to lock him out. The Suspect entered and began to grab the Victim "aggressively" on both of her arms.

The Victim stated the Suspect then began to slide his hand through her shirt and "squished" her boobs. The Victim recalled wearing black pants with gray on them, and pink underwear. She was wearing a yellow or orange shirt with a bear on it. The Victim said her bra was pink, but didn't clip on the back. She described it as being like a sports bra with strands. The Victim continued, "He (Suspect) touched me under my shirt, on top of my bra. It was my left boob, and grabbed my arm with his other hand. He said that my body was perfect. He sat me down on the little table in my room. My legs were open and his torso was in-between my legs. I could feel his fingers go through my clothes and touch my stomach. I could feel his other arm grabbing harder and being more aggressive. I could feel his shirt touch my shirt. I could feel his belt. I was in shock so I didn't say anything.

When asked by the Interviewer what made the Suspect stop, the Victim said that he would hear someone either coming into the house or a car pulling up to the house.

After hearing the above disclosure, Affiant determined there was probable cause to charge the Suspect with **1 count of lewdness with a minor - less than 14 years of age.**

The Victim stated that the Suspect was supposed to sleep on the floor, but stated that usually the Victim, the Victim's Mother, and the Suspect would co-sleep in the Victim's Mother's bed, however the Victim did not disclose of any abuse occurring by the Suspect when in bed. The Victim stated that her Mother would sleep in the middle of the two.

Incident #3 (2726 Englestad): The Victim disclosed an incident which took place during

the time period in 2020 when the Suspect was living with them. The Victim recalled being 8 years old at the time. The Victim stated the incident took place in the evening and began when the Suspect asked the Victim if she wanted to go to 7-Eleven (convenience store). The Victim recalled getting into the Suspect's vehicle, which she described as a white truck, a 4X4, possibly a Silverado. The Victim said the Suspect kept tree branches in the bed of the pickup truck because he did landscaping.

The Victim said the Suspect did not drive her to 7-Eleven, but instead drove to the "now" Jo Mackey Magnet Elementary School (2726 Englestad), which was a site under construction at the time of the incident. The Victim disclosed that the Suspect parked in the construction site, and made her position her body a certain way. The Victim described that her elbows were on the middle "pouch thingy" (center console), and her knees and legs were bent on the front passenger seat. The Victim described her head facing the front driver's window, and her knees were touching where the front passenger car seat ended. The Victim said the Suspect exited the driver's seat, and walked around the passenger side, and opened her door, standing behind her while she was positioned the way she was.

The Victim described the following, "He pulled my pants down, all I could hear was his belt unbuckling. I heard a package open up, he showed me a condom. It's a protection thingy, my mom told me. He was standing up, where the door from the car was, there's a stand so you can put your feet on it. He went onto the stand, used the stand, and went into the car where I was, and he tried to have intercourse with me. It was in the back of my body." The Victim continued, "He put on the condom, on his thing." The Victim identified the Suspect's "thing" as a penis. The Victim said, "He tried to put his penis into my butt. I felt his hands try to spread my buttcheek and put it in. He had a bigger body part than me. I felt his hands go around my waist, and I felt his thumbs open and spread my buttcheeks." When asked by the Interviewer to identify the body part where the Suspect tried to put his penis in, the Victim said, "He tried to put it in my butt, it was a hole, used to go to the bathroom, to poop. Only the tip of his penis went in. It felt almost like when you're constipated, when your body puts it back in."

The Victim stated she was wearing blue underwear and dark pink leggings at the time.

The Victim said, "when he took off my pants, he took my pants off with my underwear. I got scared and I wanted to scream for help, but no one was there. He was holding my mouth, I cried. He was groaning and kept saying my body is perfect."

When asked to describe the package the condom came in, the Victim said, "The package was silver, the condom was a skinnish color, I felt it. It was almost like if you put oil or lotion on your hands, it felt like that. Greasy. I didn't like that feeling at all. I felt it when it went into my hole."

The Victim was asked to describe the Suspect's penis. The Victim explained, "On the tip it was pinkish, downwards it was a skinnish color. The color of a hand, but a little darker than my color hand. The shape of the tip was a circle, ovalish.but trianglish at the same time."

When asked how her body felt afterwards, the Victim said, "I felt the hole of my butt later in the day, it started hurting, after a while it felt fine. I was able to use the bathroom. My poop was a brown, normal color.

The Victim stated that the Suspect got frustrated that he could not fully penetrate her anus, so he stopped and took her home.

After hearing this disclosure from the Victim, Affiant determined there was probable cause to charge the suspect with **1 count of sexual assault with a minor - less than 14 years of age** due to the Suspect putting the tip of his penis into the Victim's anus.

Incident #4 (2716 Shield): The Victim continued the interview by stating, "He would try to do the same thing in the room." The Victim recalled another incident while she was still 8 years old which occurred in her Mother's bedroom of 2716 Shield.

The Victim stated, "I was drawing, then went to the kitchen to eat leftover sushi, then went back into my mom's room. He (Suspect) came into the room, grabbed me forcefully and put me onto the bed. He grabbed my hand and pulled my arm with one hand, and used his other hand to put my other hand behind my back, like you're being arrested, but pushed forward." The Victim stated she was positioned on the bed just as she was in the truck, with her elbows touching the bed, and her legs were bent touching the bed. The Victim stated she was facing the bedroom window, and near the side of the bed.

The Victim said, "He was standing, and was able to cover my mouth. He only took off my pants, left one side of my pants on, one of my legs was free. I was wearing underwear that looked like boxers, he pulled them down. One side of my underwear was on, one wasn't. My legs were positioned in the middle of his legs. His torso was touching my back, my butt. His other hand was touching my back. That time he did the same exact thing in the car, but couldn't. He tried to put his penis in my butt. He tried to force it in. He grabbed his penis with his hand, put it in, but he was a lot bigger than me, he penis was thicker, he couldn't fit it in."

The Victim continued, "He grabbed his penis and tried to push the penis into my butt, the hole of my butt. I could feel it on the side of my hole. The tip of his penis touched the side of my hole. I felt constipated, but it hurt a little more. He got upset, he wasn't being gentle. He said, "this is stupid." I could feel him actually pushing it. He gave up because he couldn't do it. He then zipped up his pants, put his belt back up and left the room."

The Victim said that her anus hurt a tiny bit when she next used the bathroom, and her bowel movements were regular.

After hearing this disclosure from the Victim, Affiant determined there was probable cause to charge the Suspect with 1 count of sexual assault with a minor - less than 14 years of age, due to the Victim stating that she felt the Suspect's penis, however slight, penetrating the side wall of the Victim's anus.

Incident #5 (2716 Shield): The Victim continued to disclose of another incident of sexual abuse by the Suspect. The Victim said, "Another time, in my Mom's room, no one else was home. He came into my room, put on a condom, didn't do the back, did it from the front this time. He was holding his penis up straight. My vagina was on his penis." The Victim stated she was in her mother's room watching a Christmas movie. The Suspect came into the room, grabbed the Victim's arms but didn't push her onto the bed this time. The Victim said, "He told me what he was going to do. He said, "You're going to go on top of my penis." The Victim continued, "He made me go up and down. It wasn't fully in, and didn't hurt as much as the back. My pants were fully off, just my shirt was on. His pants were down. I was wearing peach colored underwear. When he laid down on the bed, I was on the side of him. He grabbed my arm and

waist, and he pulled me with my arm and waist and put me on top of him. When I was on his penis, he hands were directly on my waist, massaging my waist. I could feel his hands going up and down on my waist."

The Victim continued, "He kept groaning and saying my body was perfect. I heard gushing noises. It was coming from his penis. His penis was in the middle of my vagina, the part that is used for peeing. He heard a car sound and thought it was my mom, so he quickly got up and left." The Victim stated the Suspect said, "I'm just gonna let you be." The Victim said afterwards she felt like she had to go to the bathroom. The Victim described urinating and saw bubbles in her urine.

After hearing this disclosure from the Victim, Affiant determined there was probable cause to charge the Suspect with **1 count of sexual assault with a minor - less than 14 years of age** for putting his penis in the Victim's vagina.

Incident #6 (2716 Shield): Lastly, the Victim remembered another incident which occurred at the residence. The Victim said, "one time he (Suspect) put lotion on his pointer finger and put his finger in my ass, in my mom's room." The interviewer asked the Victim to give details. The Victim stated, "I was laying on the bed, that's when he told me what he wanted to do. He took my pants down, I was wearing white boxers, he took them off. My mom had a counter where she would put perfumes, he had lotion. He put lotion on his finger, grabbed his finger and shoved it up my ass. I was laying on my stomach, he was just sitting down on the bed on the edge. His other hand was on his lap. When it was in my hole, he would move it a little bit, went around my hole, taking it out and sticking it back in."

The Victim was asked how this felt. The Victim said, "It didn't feel as bad as with his penis. It felt like when you're trying to poop." The Victim was unsure how it stopped, but she believed the Suspect either got "bored" or "heard a car." The Victim described the bottle of lotion as being a very big pink colored bottle.

After hearing this disclosure from the Victim, Affiant determined there was probable cause to charge the Suspect with **1 count of sexual assault with a minor - less than 14 years of age** for digitally penetrating the Victim's anus.

The Victim described disclosing to her mother about the abuse. When asked by the Interviewer what made her eventually tell her mother, she said, "I was fed up, I could deal with him no more. If I didn't do what he said, he'd get mad. I wanted this hell to be over with. My mom saw a change in my behavior and confronted me about it." When asked what she wanted to see happen to the Suspect, the Victim replied, "Rot in jail, never come out."

The Victim stated that the Suspect lived with them for 4-6 months, and the last time she saw him was when he was kicked out of the house between March and May of 2020. The Victim said the abuse occurred weekly, but she disclosed in detail only the above six incidents.

It should be noted that using online investigative research methods, Affiant was able to obtain a photo of the Suspect's vehicle during the time when the sexual assault took place in the Suspect's truck. The description of the vehicle matched that of what the Victim described. In the photo, there is also landscaping debris in the bed of the pickup truck. Affiant attached a copy of the photo to the report.

Conclusion: After reviewing the facts and circumstances in this case, as well as the Victim's disclosures and outcry witness statements, Affiant determined **probable cause to arrest the Suspect in this case for the following: 2 counts of lewdness with a minor - less than 14 years of age, 4 counts of sexual assault with a minor - less than 14 years of age.**

After establishing probable cause for an arrest of the Suspect, Affiant attempted several methods of contacting the Suspect. After attempting to make contact at approximately five prior last known addresses for the Suspect, and attempting numerous contact numbers for the suspect, Affiant was unable to locate the Suspect. It is unknown whether the Suspect is still residing in the Las Vegas area, and without an arrest warrant, it is unlikely the suspect will be located using investigative methods.

Affiant believes that at the conclusion of this investigation, there are sufficient facts to show that **Ramses Zamarron-Estrada** did commit the offenses of **Sexual Assault with a Child Less than 14 years of age and Lewdness with a Minor Less than 14 years of age,**

as defined in Nevada Revised Statutes 200.366.3C and 201.230.2.

WHEREFORE, Affiant prays that a Warrant of Arrest be issued for **Ramses Zamarron-Estrada** on the charge of **(4) counts of Sexual Assault with a Child Less than 14 years of age (NRS 200.366.3C) and (2) counts of Lewdness with a Minor Less than 14 years of age (NRS 201.230.2).**

1947
Detective A. Rosenthal, P#1947, Affiant

SUBSCRIBED and SWORN to before me by
A. Rosenthal, P#1947 this 20th day of December, 2022.

Notary Public In and For Said County and State

SONIA AISPURO
NOTARY PUBLIC
STATE OF NEVADA
My Commission Expires: 05-05-25
Certificate No: 05-98385-1

EXHIBIT B

23CRN000087-0000 STATE OF NEVADA VS ZAMARRONESTRADA, RAMSES O. OPEN

- Case Type:
- CRIMINAL COMPLAINT NLV
- Case Status:
- OPEN
- File Date:
- 01/17/2023
- DCM Track:
-
- Action:
- LEWDNESS W/CHILD UNDER AGE 14, 1ST
- Status Date:
- 01/17/2023
- Case Judge:
- TYRRELL, NATALIE L
- Next Event:
- 10/17/2023

All Information | Party | Charge | Ticket/Citation # | Event | Docket | Disposition

Party Information

ZAMARRONESTRADA, RAMSES O.
- DEFENDANT CR/TR

- Disposition
-
- Disp Date
-
- Scope ID Number
- 2854368

Alias

Party Attorney
- Attorney
- DECASTROVERDE, ORLANDO
- Bar Code
- 007320
- Address
- Phone
-

More Party Information

Party Charge Information

- **ZAMARRONESTRADA, RAMSES O.**
- **- DEFENDANT CR/TR**
  Charge # 1:
  50975 - FELONY LEWDNESS W/CHILD UNDER AGE 14, 1ST

- Original Charge
- 50975 LEWDNESS W/CHILD UNDER AGE 14, 1ST (FELONY)
- Indicted Charge
-
- Amended Charge
-
- DV Related?
-
- Modifiers
-
- Stage Date
-
- PCN
-
- PCN Sequence
- 1

- Ticket #
-
- ATN #
-
- Tracking #
-
- Place of Offense
- NORTH LAS VEGAS TOWNSHIP
- Offense Location
-
- Date of Offense
- 09/23/2022
- Complainant
-

Sentencing Information

- **ZAMARRONESTRADA, RAMSES O.**
- **- DEFENDANT CR/TR**
  Charge # 3:
  50975 - FELONY LEWDNESS W/CHILD UNDER AGE 14, 1ST

- Original Charge
- 50975 LEWDNESS W/CHILD UNDER AGE 14, 1ST (FELONY)
- Indicted Charge

- Ticket #
-
- ATN #

- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- PCN
- PCN Sequence
  2

- Tracking #
- Place of Offense
  NORTH LAS VEGAS TOWNSHIP
- Offense Location
- Date of Offense
  09/23/2022
- Complainant

Sentencing Information

- ZAMARRONESTRADA, RAMSES O.
- - DEFENDANT CR/TR

Charge # 3:
50105 - FELONY SEXUAL ASSAULT AGAINST CHILD UNDER 14

- Original Charge
  50105 SEXUAL ASSAULT AGAINST CHILD UNDER 14 (FELONY)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- PCN
- PCN Sequence
  3

- Ticket #
- ATN #
- Tracking #
- Place of Offense
  NORTH LAS VEGAS TOWNSHIP
- Offense Location
- Date of Offense
  09/23/2022
- Complainant

Sentencing Information

- ZAMARRONESTRADA, RAMSES O.
- - DEFENDANT CR/TR

Charge # 4:
50105 - FELONY SEXUAL ASSAULT AGAINST CHILD UNDER 14

- Original Charge
  50105 SEXUAL ASSAULT AGAINST CHILD UNDER 14 (FELONY)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- PCN
- PCN Sequence
  4

- Ticket #
- ATN #
- Tracking #
- Place of Offense
  NORTH LAS VEGAS TOWNSHIP
- Offense Location
- Date of Offense
  09/23/2022
- Complainant

Sentencing Information

- ZAMARRONESTRADA, RAMSES O.
- - DEFENDANT CR/TR

Charge # 5:
50105 - FELONY SEXUAL ASSAULT AGAINST CHILD UNDER 14

- Original Charge
  50105 SEXUAL ASSAULT AGAINST CHILD UNDER 14 (FELONY)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- PCN
- PCN Sequence
  5

- Ticket #
- ATN #
- Tracking #
- Place of Offense
  NORTH LAS VEGAS TOWNSHIP
- Offense Location
- Date of Offense
  09/23/2022
- Complainant

Sentencing Information

Load Party Charges 6 through 7 Load All 7 Party Charges

Ticket/Citation

Citation # : - NORTH LAS VEGAS TOWNSHIP

- Offense Date
- 09/23/2022

- Agency
  - NORTH LAS VEGAS POLICE DEPARTMENT
  - Officer
  - Second Officer
  - Complainant

- Speed Cited
- Speed Limit
- Location
- Insured/Proof
- Accident
  - N
- Work Zone
- Haz Mat
- Points
- Priors
- License Taken
  - N
- BAC

- Plate
- State
- Year
- Type
- Style
- Color

Events

Date/Time	Location	Type	Result	Event Judge
07/15/2023 08:00 AM	DEPARTMENT 3	PRETRIAL CUSTODY STATUS HEARING NLV	CRIMINAL HEARING HELD	HARRIS, BELINDA T
07/18/2023 08:30 AM	DEPARTMENT 2	FELONY ARRAIGNMENT NLV	ARRAIGNMENT HEARING HELD	TYRRELL, NATALIE L
08/01/2023 09:30 AM	DEPARTMENT 2	PRELIMINARY HEARING NLV	PRELIMINARY HEARING CONTINUED - DEFENSE ESQ REQUEST	TYRRELL, NATALIE L
10/17/2023 09:30 AM	DEPARTMENT 2	PRELIMINARY HEARING NLV		TYRRELL, NATALIE L

Docket Information

Date	Description	*Docket Text*	Amount Owed	Amount Due
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #1: LEWDNESS W/CHILD UNDER AGE 14, 1ST		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #2: LEWDNESS W/CHILD UNDER AGE 14, 1ST		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #3: SEXUAL ASSAULT AGAINST CHILD UNDER 14		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #4: SEXUAL ASSAULT AGAINST CHILD UNDER 14		

Date	Description	Docket Text	Amount Owed	Amount Due
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #5: SEXUAL ASSAULT AGAINST CHILD UNDER 14		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #6: SEXUAL ASSAULT AGAINST CHILD UNDER 14		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #7: KIDNAPPING OF MINOR, 1ST DEGREE		
01/17/2023	COMPLAINT SWORN TO & FILED	COMPLAINT SWORN TO AND FILED:		
01/23/2023	ARREST WARRANT ISSUED	Complaint FILED. Upon Motion by State, Arrest Warrant ISSUED. BAIL SET. ARREST WARRANT - CRIMINAL created on: 01/23/2023 For: ZAMARRONESTRADA, RAMSES O. Bond Amt: $ 0.00		
01/23/2023	ALERT INFORMATION	ALERT INFORMATION ARREST WARRANT - CRIMINAL issued on: 01/23/2023 For: ZAMARRONESTRADA, RAMSES O. Bond Amt: $ NO BAIL		
07/14/2023	ALERT INFORMATION	ALERT INFORMATION ARREST WARRANT - CRIMINAL served on: 07/13/2023 For: ZAMARRONESTRADA, RAMSES O.		
07/14/2023	SET FOR COURT APPEARANCE	SET FOR COURT APPEARANCE Event: PRETRIAL CUSTODY STATUS HEARING NLV Date: 07/15/2023 Time: 8:00 am Judge: HARRIS, BELINDA T Location: DEPARTMENT 3 Result: CRIMINAL HEARING HELD		
07/15/2023	OFFICERS PRESENT NLVJC DEPT 3	C. NEWMAN FOR N. L. TYRRELL, JP C. LAURENT, DDA L. AVANTS, DPD M. REHAGEN, CLERK A. HERRERA, SI RECORDED BY JAVS		
07/15/2023	HEARING HELD	HEARING HELD Defendant PRESENT in NLV custody with the assistance of a Spanish interpreter (Booked on warrant of arrest) Valdez-Jimenez hearing heard State requests a $250,000 bail setting with high level electronic monitoring and a no contact order with the victim or any minors. These are extremely violent and troubling allegations. He preyed upon the victim on multiple occasions. He is facing a possible life sentence. He is a danger to the community and a flight risk. Defense requests a low bail setting or electronic monitoring. Defendant has no criminal history. He is not a flight risk. Defense was unable to interview the Defendant due to the language barrier. Defense is unsure of Defendant's employment or contacts with the community. Per Court, the Parties may readdress bail in the future. Court has sufficient information for the bail hearing. Court finds the Defendant to be a danger to the community. Bail Set: $200,000 total bail with high level electronic monitoring. Court admonishes the Defendant to have no contact with the victim or any minors and to stay away from the victim's residence. PASSED for initial arraignment Defendant remanded to CCDC CCDC/$200,000 total bail with EMP HIGH (no contact/stay away)		
07/15/2023	SET FOR COURT APPEARANCE	SET FOR COURT APPEARANCE Event: FELONY ARRAIGNMENT NLV Date: 07/18/2023 Time: 8:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2 Result: ARRAIGNMENT HEARING HELD		
07/18/2023	OFFICERS PRESENT NLVJC DEPT 2	N. L. TYRRELL, JUDGE M. GILES, DDA T. SMITH, DPD M. TORRES, SPANISH INTERPRETER		

Date	Description	Docket Text	Amount Owed	Amount Due
		A. HILL, CLERK RECORDED BY JAVS		
07/18/2023	ARRAIGNMENT HEARING HELD	ARRAIGNMENT HEARING HELD DEFENDANT IS PRESENT IN COURT IN CUSTODY WITH NLV PUBLIC DEFENDER IS APPOINTED PRELIMINARY HEARING IS SET NLV $200K		
07/18/2023	SET FOR COURT APPEARANCE	SET FOR COURT APPEARANCE Event: PRELIMINARY HEARING NLV Date: 08/01/2023 Time: 9:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2		
08/01/2023	OFFICERS PRESENT NLVJC DEPT 2	N. L. TYRRELL, JUDGE M. GILES, DDA R. SAMANO ESQ. FOR O. DECASTROVERDE ESQ. M. BERRY, SPANISH INTERPRETER A. HILL, CLERK RECORDED BY JAVS		
08/01/2023	PRELIMINARY HEARING CONTINUED - DEFENSE ESQ REQUEST	PRELIMINARY HEARING CONTINUED - DEFENSE ESQ REQUEST DEFENDANT IS PRESENT IN COURT IN CUSTODY WITH CCDC R. SAMANO ESQ. SUBSTITUTES IN AS ATTORNEY OF RECORD FOR O. DECASTROVERDE ESQ. PRELIMINARY HEARING IS CALLED OFF DEFENSE REQUESTS CONTINUANCE MOTION GRANTED PRELIMINARY HEARING IS RESET CCDC $200K		
08/01/2023	SET FOR COURT APPEARANCE	SET FOR COURT APPEARANCE Event: PRELIMINARY HEARING NLV Date: 10/17/2023 Time: 9:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2		

Case Disposition

Disposition	Date	Case Judge
UNDISPOSED		TYRRELL, NATALIE L

EXHIBIT C

NEVADA PRETRIAL RISK (NPR) ASSESSMENT

Defendant's Name: RAMSES ZAMARRON ESTRADA | Booking #: 2954368

Assessment Date: 7-15-2023 | Assessor: NK | County: Clark

Defendant's Name: RAMSES ZAMARRON ESTRADA | DOB: 3-26-1982 | AGE: 41 | Case/Booking #: 23CRN000087-0000

Dept. #: NLV JC-2

Was the defendant interviewed: ☐ Yes ☒ No HOUSED

Address: NOT INTERVIEWED | Contact Phone #: | # of Current Charges: 7

City:

State: Zip:

Most Serious Charge: Sex assit against child < 14 | Total Bail at booking: NO BAIL

SCORING ITEMS		SCORE
1.	Does the Defendant Have a Pending Pretrial Case at Booking? No If yes, list case # and jurisdiction: NONE	0
2.	Age at First Arrest (include juvenile arrests) First Arrest Date 4-24-2012 21 to 35 yrs	1
3.	Prior Misdemeanor Convictions (past 10 years) None	0
4.	Prior Felony/Gross Misd. Convictions (past 10 years) None	0
5.	Prior Violent Crime Convictions (past 10 years) None	0
6.	Prior FTAs (past 24 months) None	0
7.	Substance Abuse (past 10 years) Other	0
8.	Mitigating Verified Stability Factors (limit of -2 pts. total deduction) None verified	0
	TOTAL SCORE:	1

Risk Level: Low | OVERRIDE?: ☒ Yes ☐ No

Override Reason(s): Ser F Cat A

If Other, explain: N/A

Final Recommended Risk Level: Moderate ☐ LOW ☒ MODERATE ☐ HIGHER

Supervisor/Designee Signature: Gretchen Anderson | Date: 7-15-2023

Revised 8.2021

NEVADA PRETRIAL RISK (NPR) ASSESSMENT

Defendant's Name: RAMSES ZAMARRON ESTRADA Booking #: 2854368

Felony/Gross Misdemeanor Convictions: 0

YEAR	STATE	CHARGE

Misdemeanor Convictions: 0

FTAS: 1

Detainers: NO DETAINERS

Pending Cases: NO PENDING CASES

Revised 8.2021

Electronically Filed
11/1/2023 10:33 AM
Steven D. Grierson
CLERK OF THE COURT

DISTRICT COURT
CLARK COUNTY, NEVADA
****

State of Nevada vs Ramses Zamarronestrada	Case No.: C-23-377884-1 Department 3

NOTICE OF HEARING

Please be advised that the Defendant's Motion to Reset Bail in the above-entitled matter is set for hearing as follows:

Date: November 07, 2023

Time: 9:30 AM

Location: RJC Courtroom 11C
Regional Justice Center
200 Lewis Ave.
Las Vegas, NV 89101

NOTE: Under NEFCR 9(d), if a party is not receiving electronic service through the Eighth Judicial District Court Electronic Filing System, the movant requesting a hearing must serve this notice on the party by traditional means.

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Alexandrea Birch
Deputy Clerk of the Court

CERTIFICATE OF SERVICE

I hereby certify that pursuant to Rule 9(b) of the Nevada Electronic Filing and Conversion Rules a copy of this Notice of Hearing was electronically served to all registered users on this case in the Eighth Judicial District Court Electronic Filing System.

By: /s/ Alexandrea Birch
Deputy Clerk of the Court

Electronically Filed
11/6/2023 10:37 AM
Steven D. Grierson
CLERK OF THE COURT

MOT
Orlando De Castroverde
Nevada Bar No. 7320
1149 South Maryland Pkwy
Las Vegas, NV 89104
Tel: 702.383.0606
Attorneys for Defendant

EIGHT JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA, Plaintiff, vs. RAMSES ZAMARRON ESTRADA, Defendant	Case No.: C-23-377884-1 **MOTION TO RESET BAIL DEPT. III**

Comes Now, Ramses Zamarron Estrada, by and through his Attorney Orlando De Castroverde hereby files this Motion to Reset Bail in the above-entitled case. This Motion is based and made upon the attached Points and Authorities and all papers and documents on file herein.

POINTS AND AUTHORITIES

STATEMENT OF FACTS

Defendant Ramses Zamarron Estrada initially was detained at the Clark County Detention Center charged with two counts of Lewdness with a Child under the Age of 14 and several counts of Sexual Assault against Child under the Age of 14. The allegations surfaced on or about November 2022, but the allegations relate to alleged events dating back to 2020. (*See* attached Exhibit A).

Defendant was arrested on an arrest warrant and appeared before Judge Pro Tempore C. Newman on July 15, 2023. Pro Temp Judge Newman held a Valdez-Jimenez hearing and set the bail at $200,000 and ordered high-level electronic monitoring. The court minutes reflect that his court-appointed attorney at the time did not interview Defendant due to "language barrier." (*See* attached Exhibit B, 7-15-23 entry titled "Hearing Held"). The court attorney admitted that he was unsure of Defendant's employment or contacts with the community. The allegations made by the State's attorney were never refuted. Judge Newman stated that the parties may readdress bail in the future. (*See*, Supra).

Undersigned filed a motion to Reopen the Valdez Jimenez Hearing. After argument by all parties, Judge Pro Tempore Yvette Maningo reset the bail at $50,000 plus high-level electronic monitoring. Unfortunately, Defendant and his family do not have the financial means to post the bail bond.

Defendant appeared in-custody at his preliminary hearing. The State presented an offer of Attempt Lewdness on a Minor under 14 years of Age and will make no recommendation at sentencing. This offer is a significant reduction from the original charges. Defendant agreed to accept the offer and now has pled to the amended charge pursuant to North Carolina v. Alford. Defendant now files this motion requesting that his custody status be heard.

ARGUMENT

Nevada Revised Statute 178.4851 states that a:

> court shall only impose bail or a condition of release, or both, on a person as it deems to be the least restrictive means necessary to protect the safety of the community or to ensure that the person will appear at all times and places ordered by the court, with regard to the factors set forth in NRS 178.4853 and 178.4983. Such conditions of release may include, without limitation:

(a) Requiring the person to remain in this State or a certain county within this State;

(b) Prohibiting the person from contacting or attempting to contact a specific person or from causing or attempting to cause another person to contact that person on the person's behalf;

(c) Prohibiting the person from entering a certain geographic area;

(d) Prohibiting the person from possessing a firearm during the pendency of the case; or

(e) Prohibiting the person from engaging in specific conduct that may be harmful to the person's own health, safety or welfare, or the health, safety or welfare of another person.

2. A prosecuting attorney may request that a court impose bail or a condition of release, or both, on a person. If the request includes the imposition of bail, the prosecuting attorney must prove by clear and convincing evidence that the imposition of bail is necessary to protect the safety of the community or to ensure that the person will appear at all times and places ordered by the court, with regard to the factors set forth in NRS 178.4853 and 178.498.

3. If a court imposes bail or any condition of release, or both, other than release on recognizance with no other conditions of release, the court shall make findings of fact for such a determination and state its reasoning on the record, and, if the determination includes the imposition of a condition of release, the findings of fact must include why the condition of release constitutes the least restrictive means necessary to protect the safety of the community or to ensure that the person will appear at the times and places ordered by the court.

Additionally, NRS 178.4853 lists out certain factors a court must consider in reviewing an individual's custody status:

1. The length of residence in the community;
2. The status and history of employment;
3. Relationships with the person's spouse and children, parents or other family members and with close friends;
4. Reputation, character and mental condition;
5. Prior criminal record, including, without limitation, any record of appearing or failing to appear after release on bail or without bail;
6. The identity of responsible members of the community who would vouch for the reliability of the person;
7. The nature of the offense with which the person is charged, the apparent probability of conviction and the likely sentence, insofar as these factors relate to the risk of not appearing;
8. The nature and seriousness of the danger to the alleged victim, any other person or the community that would be posed by the person's release;
9. The likelihood of more criminal activity by the person after release; and
10. Any other factors concerning the person's ties to the community or bearing on the risk that the person may willfully fail to appear.

The Nevada Supreme Court in Valdez-Jimenez v. the Eighth Judicial District Court, 136 Nev. Advance Op. (2020), held that:

> (w)hen bail is set at an amount greater than necessary to serve the purpose of bail, it effectively denies the defendant his or her rights under the Nevada Constitution to be bailable by sufficient sureties and for bail not to be excessive. Thus, bail may be imposed only where it is necessary to reasonably ensure the defendant's appearance at court proceedings or to protect the community, including the victim and the victim's family. Because of the important liberty interest at stake when bail has the effect of detaining an individual pending trial, we hold that a defendant who remains in custody after arrest is entitled to an individualized hearing at which the State must prove by clear and convincing evidence that bail, rather than less restrictive conditions, is necessary to ensure the defendant's appearance at future court proceedings or to protect the safety of the community, and the district court must state in its findings and reasons for the bail decision on the record.

It should be noted that Judge Newman never explained his findings and reasons when he set the extraordinarily high bail amount along with electronic monitoring. Defendant cannot, and never will, be able to achieve this bail amount even when reset by Pro Temp Judge Maningo.

At the prior hearings, the State made allegations that the acts were "extremely violent and troubling" and that Defendant "preyed upon the victim on multiple occasions." (*See*, Supra). In reading Detective A. Rosenthal's Affidavit for Arrest Warrant, the alleged victim never stated she was being preyed upon or that Defendant had been physically violent. Instead, this case is a typical situation where an allegation of improper conduct is made but where there is no corroborating evidence. There is absolutely no scientific evidence or eyewitness testimony that these assaults occurred. The affidavit does reference that an older sister named Perla repeated an unverified hearsay statement regarding Defendant and his natural daughter, and this older sister also claims that she saw Defendant enter a room where the alleged victim may have been staying. However, the Detective did not follow-up with details that the older sister suspected

that something bad happened to her younger sister. Defendant is adamant that he never closed any door to be alone with the alleged victim.

Troubling, the affidavit fails to note that there were other adults living at this home. Defendant is surprised that the report fails to mention the husband of older sister Perla, named Kevin, who always was present at the home. Additionally, the victim had a brother named Alfonso, who also was always present with his husband. Most of the time, Defendant was out working alongside the mother of the alleged victim named Maria.

Defendant also has long ties to the Las Vegas area. Defendant has lived in the Las Vegas area for the past 12-years and has lived in the United States for the past 17-years. He has one daughter, who was born in the United States named Amaris, who lives in Arizona. Defendant has family in Mexico, but he also has a brother living in Kansas. At the time of the arrest, Defendant was renting a room at a house on the corner of Easter and Palm Vista. He has worked odd jobs in the construction industry as a handyman and as an auto repairman specializing in painting cars. If released, he plans on returning to work as a handyman or returning to employment with his former boss, Dwaynne Johnson.

Defendant has been in a long-term relationship with a lady named Maria Soto. If allowed to be released, he can live with his girlfriend at 2746 Jennydiane Dr., Apt. D. 89121.[1] There are no minors living at this latter address. This Court should note that Defendant was very active in his church community and attends regularly at "Communidad Cristiana Ven y Ve." He has volunteered at this and other churches and has a friendship with a Pastor named Cesar Martinez.

Finally, Defendant was interviewed by the jail for the Nevada Pretrial Risk Assessment. Defendant scored a "1" on the assessment and deemed "low risk". Due to the charges contained in the criminal complaint contained several Category A felonies, the assessment recommended to override and opined to deem Defendant a "Moderate" risk. (*See* attached Exhibit C). Defendant now has pled to a probationable Category B felony, and his custody status needs to be revisited as he still has the high bail set by the prior Pro Temp Judge based on the original charges.

In all, Defendant requests that his bail be reduced or alternatively be placed on high-level electronic monitoring.

Dated this 26th day of October, 2023

By: //S// Frank Coumou
Frank Coumou
Nevada Bar No. 4577
Vilma Nunez
Nevada Bar No. 15446
Orlando De Castroverde
Nevada Bar No. 7320
Attorneys for Defendant

RECEIPT OF COPY

RECEIPT OF COPY of MOTION TO RESET BAIL is acknowledged this _____ day of October, 2023.

_____
DISCTRICT ATTORNEY

CERTIFICATE OF SERVICE

I hereby certify that a copy of MOTION TO RESET BAIL Dept. III was served on the North Las Vegas Justice Court (Criminal Division) via fax at:

(702) 455-1361 by:

BY: */s/ Vanessa Meza* _____
Legal Assistant at De Castroverde Law Group

EXHIBIT A

AFFIDAVIT 2211160021880

State of NEVADA)
) ss:
County of Clark)

Detective A. Rosenthal, P#1947, being first duly sworn, deposes and says:

That he is a Police Detective with the North Las Vegas Police Department, City of North Las Vegas, County of Clark, State of Nevada, being so employed for a period of 16 years, assigned to investigate the crime(s) of **Sexual Assault with a Child Less than 14 years of age and Lewdness with a Minor Less than 14 years of age**, committed on or about November 01, 2020, which investigation has developed **Ramses Zamarron-Estrada** as the perpetrator(s) thereof.

That Affiant developed the following facts in the course of the investigation of said crime, to wit: **Primary Information** - The original reporting officer and responding patrol officers were dispatched to Fitzgerald Elementary School (2650 Revere, NLVN) on 11/16/22 regarding the disclosure of sexual abuse by the 11 year old female Victim. The Victim disclosed to Outcry 1 at school, and alleged the Mother of Victim had a friend/roommate (Suspect) stay at their residence during 2020. The Victim claimed the Suspect would commit lewd acts and sexual assaulted her on several occasions during this time. The sexual abuse took place at both 2716 Shield in North Las Vegas, and 2726 Englestad St, in North Las Vegas. The Suspect no longer lives with the Victim's mother.

Officers Involved: Ofc. A. Zarate, P#2846 (Original reporting officer), Ofc. Walch, P#2424 - responding patrol officer, Ofc. Rigsby, P#2543 - responding patrol officer, Det. A. Rosenthal, P#1947 - (Investigating Detective).

Suspect: Zammaron-Estrada, Ramses - DOB: 03/26/1982 (Suspect)
Victim: Torres-Diaz, Josephine - DOB: 09/23/2011 (Victim), 2716 Shield, NLVN 89030.

Witnesses/Others: Montes, Melissa - Fitzgerald Elementary School Counselor (Outcry 1), Diaz-Llama, Maria De La Cruz - DOB:08/22/1979 (Mother of Victim / Outcry 2), Llamas-Diaz, Perla - DOB: 10/24/1993 (Sister of Victim / Outcry 3), Elizabeth Espinoza - SNCAC (Forensic Interviewer)

Details of Probable Cause: The Original Reporting Officer and responding patrol

officers were dispatched to Fitzgerald Elementary School (2650 Revere, NLVN) on 11/16/22 regarding the disclosure of sexual abuse by the 11 year old female Victim. The Victim disclosed to Outcry 1 at school, and alleged the Mother of Victim had a friend/roommate (Suspect) stay at their residence during 2020.

Outcry 1 told the Original Reporting Officer that she was approached by the Victim at lunch and asked if she could speak privately. Once in private, the Victim told Outcry 1 that she was sexually assaulted a number of different times by the Suspect. The Victim identified the Suspect as a man her mother knew, who stayed at their residence (2716 Shield, NLVN) for approximately six months in the year 2020. The Victim stated that the Suspect did inappropriate things to her at this time, to include being kissed on the lips by the Suspect, having her vagina touched by the Suspect, and the Suspect attempting to penetrate her vagina with his penis. After the sexual abuse took place, the Victim's Mother noticed a change in the Victim's behavior and confronted her. The Victim disclosed the abuse to her Mother, at which time the Suspect was kicked out of the house by the Victim's Mother. The Victim has not seen the Suspect since.

The Victim had made outcries to not only her mother, but her sister as well (Outcry 3)

Officers interviewed Outcry 3, who stated that she was aware that something had happened to the Victim about 2 years ago with the Suspect, who was staying with them at the time. Outcry 3 stated Ramses stayed at the residence with them for about six months until he abruptly left. The Victim's Mother had told her that the Suspect had touched the Victim's butt over her clothes, and that was the reason why she kicked him out. Outcry 3 told police the Suspect was always playing with them and never noticed if the Suspect touched the Victim inappropriately. She observed a few times that the Suspect would enter the room where the Victim was, and locked the door. Outcry 3 did not like that, and she would take the Victim out of the room. Outcry 3 stated that the Suspect had told her about his previous relationship. The Suspect stated that he is not able to see his own daughter because his ex-wife is crazy and accused him of sexual assaulting his daughter.

After the disclosures made by the Victim, Affiant scheduled a Forensic Interview (FI) at the Southern Nevada Children's Advocacy Center - SNCAC (701 N Pecos #K, LVN) on

12/08/22. A forensic interview of a child is a developmentally sensitive and legally sound method of gathering information regarding allegations of abuse and/or exposure to violence. This interview is conducted by a neutral professional utilizing research and practice-informed techniques as part of a larger investigative process. The Victim was interviewed by Elizabeth Espinoza, and Affiant observed the FI remotely on audio/video monitors.

During the FI, the Victim disclosed of six separate detailed incidents of sexual abuse by the Suspect. Although the Victim said that the abuse occurred additional times and estimated the sexual abuse taking place up to twenty separate times, these were the six incidents given in great detail by the Victim.

Incident #1 (2304 E Oakey): The Victim disclosed she was at the Suspect's old residence (identified as 2304 E Oakey, LVN using online investigative research methods), prior to him moving in with them at 2716 Shield. The Victim stated she was in 3rd grade, either 7 or 8 years old at the time. The Victim said she, her Mother, and brother went over to the Suspect's house to use his pool. The Victim's Mother and brother left for a few minutes to run to the store. The Victim stated she was sitting at the edge of the pool when her mother and brother went to the store. The Suspect was already in the pool, grabbed both of the Victim's arms and pulled her into the pool, at which time the Suspect wrapped his legs around the Victim, and pulled her into him. The Suspect then kissed the Victim on the lips. The Victim recalled the Suspect putting his tongue in her mouth, and it lasted about five seconds. The Victim stated, "When he kissed me, he put both of his arms on my shoulder, kind of massaging them. One of his hands was then around my waist. I had my eyes closed. I could feel his nose touch mine. His tongue was in my mouth and his lips on mine. Like a "french kiss." It made me feel uncomfortable, sad. I kind of barely knew the man."

The Victim said she remembers the Suspect wearing an orange shirt and black shorts in the pool. After kissing the Victim, she pulled away from him and threatened to kill the Victim's mother if she told anyone.

After hearing the above disclosure, Affiant determined there was probable cause to charge the Suspect with **1 count of lewdness with a minor - less than 14 years of age.**

Incident #2 (2716 Shield): The Victim disclosed on an incident of sexual abuse which took place inside her bedroom located at 2716 Shield. The Victim stated she was 8 years old at the time, and the Suspect was living at her house at the time. The Victim stated she was getting out of the shower before bedtime. The Victim said, "My chest was growing at the time. I was putting on my bra and he (Suspect) knocked on the door. I told him to give me a second." The Victim said the Suspect opened the door anyway before she could reach the lock on the door to lock him out. The Suspect entered and began to grab the Victim "aggressively" on both of her arms.

The Victim stated the Suspect then began to slide his hand through her shirt and "squished" her boobs. The Victim recalled wearing black pants with gray on them, and pink underwear. She was wearing a yellow or orange shirt with a bear on it. The Victim said her bra was pink, but didn't clip on the back. She described it as being like a sports bra with strands. The Victim continued, "He (Suspect) touched me under my shirt, on top of my bra. It was my left boob, and grabbed my arm with his other hand. He said that my body was perfect. He sat me down on the little table in my room. My legs were open and his torso was in-between my legs. I could feel his fingers go through my clothes and touch my stomach. I could feel his other arm grabbing harder and being more aggressive. I could feel his shirt touch my shirt. I could feel his belt. I was in shock so I didn't say anything.

When asked by the Interviewer what made the Suspect stop, the Victim said that he would hear someone either coming into the house or a car pulling up to the house.

After hearing the above disclosure, Affiant determined there was probable cause to charge the Suspect with **1 count of lewdness with a minor - less than 14 years of age.**

The Victim stated that the Suspect was supposed to sleep on the floor, but stated that usually the Victim, the Victim's Mother, and the Suspect would co-sleep in the Victim's Mother's bed, however the Victim did not disclose of any abuse occurring by the Suspect when in bed. The Victim stated that her Mother would sleep in the middle of the two.

Incident #3 (2726 Englestad): The Victim disclosed an incident which took place during

the time period in 2020 when the Suspect was living with them. The Victim recalled being 8 years old at the time. The Victim stated the incident took place in the evening and began when the Suspect asked the Victim if she wanted to go to 7-Eleven (convenience store). The Victim recalled getting into the Suspect's vehicle, which she described as a white truck, a 4X4, possibly a Silverado. The Victim said the Suspect kept tree branches in the bed of the pickup truck because he did landscaping.

The Victim said the Suspect did not drive her to 7-Eleven, but instead drove to the "now" Jo Mackey Magnet Elementary School (2726 Englestad), which was a site under construction at the time of the incident. The Victim disclosed that the Suspect parked in the construction site, and made her position her body a certain way. The Victim described that her elbows were on the middle "pouch thingy" (center console), and her knees and legs were bent on the front passenger seat. The Victim described her head facing the front driver's window, and her knees were touching where the front passenger car seat ended. The Victim said the Suspect exited the driver's seat, and walked around the passenger side, and opened her door, standing behind her while she was positioned the way she was.

The Victim described the following, "He pulled my pants down, all I could hear was his belt unbuckling. I heard a package open up, he showed me a condom. It's a protection thingy, my mom told me. He was standing up, where the door from the car was, there's a stand so you can put your feet on it. He went onto the stand, used the stand, and went into the car where I was, and he tried to have intercourse with me. It was in the back of my body." The Victim continued, "He put on the condom, on his thing." The Victim identified the Suspect's "thing" as a penis. The Victim said, "He tried to put his penis into my butt. I felt his hands try to spread my buttcheek and put it in. He had a bigger body part than me. I felt his hands go around my waist, and I felt his thumbs open and spread my buttcheeks." When asked by the Interviewer to identify the body part where the Suspect tried to put his penis in, the Victim said, "He tried to put it in my butt, it was a hole, used to go to the bathroom, to poop. Only the tip of his penis went in. It felt almost like when you're constipated, when your body puts it back in."

The Victim stated she was wearing blue underwear and dark pink leggings at the time.

The Victim said, "when he took off my pants, he took my pants off with my underwear. I got scared and I wanted to scream for help, but no one was there. He was holding my mouth, I cried. He was groaning and kept saying my body is perfect."

When asked to describe the package the condom came in, the Victim said, "The package was silver, the condom was a skinnish color, I felt it. It was almost like if you put oil or lotion on your hands, it felt like that. Greasy. I didn't like that feeling at all. I felt it when it went into my hole."

The Victim was asked to describe the Suspect's penis. The Victim explained, "On the tip it was pinkish, downwards it was a skinnish color. The color of a hand, but a little darker than my color hand. The shape of the tip was a circle, ovalish.but trianglish at the same time."

When asked how her body felt afterwards, the Victim said, "I felt the hole of my butt later in the day, it started hurting, after a while it felt fine. I was able to use the bathroom. My poop was a brown, normal color.

The Victim stated that the Suspect got frustrated that he could not fully penetrate her anus, so he stopped and took her home.

After hearing this disclosure from the Victim, Affiant determined there was probable cause to charge the suspect with **1 count of sexual assault with a minor - less than 14 years of age** due to the Suspect putting the tip of his penis into the Victim's anus.

Incident #4 (2716 Shield): The Victim continued the interview by stating, "He would try to do the same thing in the room." The Victim recalled another incident while she was still 8 years old which occurred in her Mother's bedroom of 2716 Shield.

The Victim stated, "I was drawing, then went to the kitchen to eat leftover sushi, then went back into my mom's room. He (Suspect) came into the room, grabbed me forcefully and put me onto the bed. He grabbed my hand and pulled my arm with one hand, and used his other hand to put my other hand behind my back, like you're being arrested, but pushed forward." The Victim stated she was positioned on the bed just as she was in the truck, with her elbows touching the bed, and her legs were bent touching the bed. The Victim stated she was facing the bedroom window, and near the side of the bed.

The Victim said, "He was standing, and was able to cover my mouth. He only took off my pants, left one side of my pants on, one of my legs was free. I was wearing underwear that looked like boxers, he pulled them down. One side of my underwear was on, one wasn't. My legs were positioned in the middle of his legs. His torso was touching my back, my butt. His other hand was touching my back. That time he did the same exact thing in the car, but couldn't. He tried to put his penis in my butt. He tried to force it in. He grabbed his penis with his hand, put it in, but he was a lot bigger than me, he penis was thicker, he couldn't fit it in."

The Victim continued, "He grabbed his penis and tried to push the penis into my butt, the hole of my butt. I could feel it on the side of my hole. The tip of his penis touched the side of my hole. I felt constipated, but it hurt a little more. He got upset, he wasn't being gentle. He said, "this is stupid." I could feel him actually pushing it. He gave up because he couldn't do it. He then zipped up his pants, put his belt back up and left the room."

The Victim said that her anus hurt a tiny bit when she next used the bathroom, and her bowel movements were regular.

After hearing this disclosure from the Victim, Affiant determined there was probable cause to charge the Suspect with 1 count of sexual assault with a minor - less than 14 years of age, due to the Victim stating that she felt the Suspect's penis, however slight, penetrating the side wall of the Victim's anus.

Incident #5 (2716 Shield): The Victim continued to disclose of another incident of sexual abuse by the Suspect. The Victim said, "Another time, in my Mom's room, no one else was home. He came into my room, put on a condom, didn't do the back, did it from the front this time. He was holding his penis up straight. My vagina was on his penis." The Victim stated she was in her mother's room watching a Christmas movie. The Suspect came into the room, grabbed the Victim's arms but didn't push her onto the bed this time. The Victim said, "He told me what he was going to do. He said, "You're going to go on top of my penis." The Victim continued, "He made me go up and down. It wasn't fully in, and didn't hurt as much as the back. My pants were fully off, just my shirt was on. His pants were down. I was wearing peach colored underwear. When he laid down on the bed, I was on the side of him. He grabbed my arm and

waist, and he pulled me with my arm and waist and put me on top of him. When I was on his penis, he hands were directly on my waist, massaging my waist. I could feel his hands going up and down on my waist."

The Victim continued, "He kept groaning and saying my body was perfect. I heard gushing noises. It was coming from his penis. His penis was in the middle of my vagina, the part that is used for peeing. He heard a car sound and thought it was my mom, so he quickly got up and left." The Victim stated the Suspect said, "I'm just gonna let you be." The Victim said afterwards she felt like she had to go to the bathroom. The Victim described urinating and saw bubbles in her urine.

After hearing this disclosure from the Victim, Affiant determined there was probable cause to charge the Suspect with **1 count of sexual assault with a minor - less than 14 years of age** for putting his penis in the Victim's vagina.

Incident #6 (2716 Shield): Lastly, the Victim remembered another incident which occurred at the residence. The Victim said, "one time he (Suspect) put lotion on his pointer finger and put his finger in my ass, in my mom's room." The interviewer asked the Victim to give details. The Victim stated, "I was laying on the bed, that's when he told me what he wanted to do. He took my pants down, I was wearing white boxers, he took them off. My mom had a counter where she would put perfumes, he had lotion. He put lotion on his finger, grabbed his finger and shoved it up my ass. I was laying on my stomach, he was just sitting down on the bed on the edge. His other hand was on his lap. When it was in my hole, he would move it a little bit, went around my hole, taking it out and sticking it back in."

The Victim was asked how this felt. The Victim said, "It didn't feel as bad as with his penis. It felt like when you're trying to poop." The Victim was unsure how it stopped, but she believed the Suspect either got "bored" or "heard a car." The Victim described the bottle of lotion as being a very big pink colored bottle.

After hearing this disclosure from the Victim, Affiant determined there was probable cause to charge the Suspect with **1 count of sexual assault with a minor - less than 14 years of age** for digitally penetrating the Victim's anus.

The Victim described disclosing to her mother about the abuse. When asked by the Interviewer what made her eventually tell her mother, she said, "I was fed up, I could deal with him no more. If I didn't do what he said, he'd get mad. I wanted this hell to be over with. My mom saw a change in my behavior and confronted me about it." When asked what she wanted to see happen to the Suspect, the Victim replied, "Rot in jail, never come out."

The Victim stated that the Suspect lived with them for 4-6 months, and the last time she saw him was when he was kicked out of the house between March and May of 2020. The Victim said the abuse occurred weekly, but she disclosed in detail only the above six incidents.

It should be noted that using online investigative research methods, Affiant was able to obtain a photo of the Suspect's vehicle during the time when the sexual assault took place in the Suspect's truck. The description of the vehicle matched that of what the Victim described. In the photo, there is also landscaping debris in the bed of the pickup truck. Affiant attached a copy of the photo to the report.

Conclusion: After reviewing the facts and circumstances in this case, as well as the Victim's disclosures and outcry witness statements, Affiant determined **probable cause to arrest the Suspect in this case for the following: 2 counts of lewdness with a minor - less than 14 years of age, 4 counts of sexual assault with a minor - less than 14 years of age.**

After establishing probable cause for an arrest of the Suspect, Affiant attempted several methods of contacting the Suspect. After attempting to make contact at approximately five prior last known addresses for the Suspect, and attempting numerous contact numbers for the suspect, Affiant was unable to locate the Suspect. It is unknown whether the Suspect is still residing in the Las Vegas area, and without an arrest warrant, it is unlikely the suspect will be located using investigative methods.

Affiant believes that at the conclusion of this investigation, there are sufficient facts to show that **Ramses Zamarron-Estrada** did commit the offenses of **Sexual Assault with a Child Less than 14 years of age and Lewdness with a Minor Less than 14 years of age,**

as defined in Nevada Revised Statutes 200.366.3C and 201.230.2.

WHEREFORE, Affiant prays that a Warrant of Arrest be issued for **Ramses Zamarron-Estrada** on the charge of **(4) counts of Sexual Assault with a Child Less than 14 years of age (NRS 200.366.3C) and (2) counts of Lewdness with a Minor Less than 14 years of age (NRS 201.230.2).**

1947
Detective A. Rosenthal, P#1947, Affiant

SUBSCRIBED and SWORN to before me by
A. Rosenthal, P#1947 this 20th day of December, 2022.

Notary Public In and For Said County and State

SONIA AISPURO
NOTARY PUBLIC
STATE OF NEVADA
My Commission Expires: 05-05-25
Certificate No: 05-98385-1

EXHIBIT B

23CRN000087-0000 STATE OF NEVADA VS ZAMARRONESTRADA, RAMSES O. OPEN

- Case Type:
- CRIMINAL COMPLAINT NLV
- Case Status:
- OPEN
- File Date:
- 01/17/2023
- DCM Track:
-
- Action:
- LEWDNESS W/CHILD UNDER AGE 14, 1ST
- Status Date:
- 01/17/2023
- Case Judge:
- TYRRELL, NATALIE L
- Next Event:
- 10/17/2023

All Information | Party | Charge | Ticket/Citation # | Event | Docket | Disposition

Party Information

ZAMARRONESTRADA, RAMSES O.
- DEFENDANT CR/TR

- Disposition
-
- Disp Date
-
- Scope ID Number
- 2854368

Alias

Party Attorney
- Attorney
- DECASTROVERDE, ORLANDO
- Bar Code
- 007320
- Address
- Phone
-

More Party Information

Party Charge Information

- **ZAMARRONESTRADA, RAMSES O.**
- **- DEFENDANT CR/TR**

Charge # 1:
50975 - FELONY LEWDNESS W/CHILD UNDER AGE 14, 1ST

- Original Charge
- 50975 LEWDNESS W/CHILD UNDER AGE 14, 1ST (FELONY)
- Indicted Charge
-
- Amended Charge
-
- DV Related?
-
- Modifiers
-
- Stage Date
-
- PCN
-
- PCN Sequence
- 1

- Ticket #
-
- ATN #
-
- Tracking #
-
- Place of Offense
- NORTH LAS VEGAS TOWNSHIP
- Offense Location
-
- Date of Offense
- 09/23/2022
- Complainant
-

Sentencing Information

- **ZAMARRONESTRADA, RAMSES O.**
- **- DEFENDANT CR/TR**

Charge # 2:
50975 - FELONY LEWDNESS W/CHILD UNDER AGE 14, 1ST

- Original Charge
- 50975 LEWDNESS W/CHILD UNDER AGE 14, 1ST (FELONY)
- Indicted Charge

- Ticket #
-
- ATN #

- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- PCN
- PCN Sequence
  2

- Tracking #
- Place of Offense
  NORTH LAS VEGAS TOWNSHIP
- Offense Location
- Date of Offense
  09/23/2022
- Complainant

Sentencing Information

- ZAMARRONESTRADA, RAMSES O.
- - DEFENDANT CR/TR

Charge # 3:
50105 - FELONY SEXUAL ASSAULT AGAINST CHILD UNDER 14

- Original Charge
  50105 SEXUAL ASSAULT AGAINST CHILD UNDER 14 (FELONY)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- PCN
- PCN Sequence
  3

- Ticket #
- ATN #
- Tracking #
- Place of Offense
  NORTH LAS VEGAS TOWNSHIP
- Offense Location
- Date of Offense
  09/23/2022
- Complainant

Sentencing Information

- ZAMARRONESTRADA, RAMSES O.
- - DEFENDANT CR/TR

Charge # 4:
50105 - FELONY SEXUAL ASSAULT AGAINST CHILD UNDER 14

- Original Charge
  50105 SEXUAL ASSAULT AGAINST CHILD UNDER 14 (FELONY)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- PCN
- PCN Sequence
  4

- Ticket #
- ATN #
- Tracking #
- Place of Offense
  NORTH LAS VEGAS TOWNSHIP
- Offense Location
- Date of Offense
  09/23/2022
- Complainant

Sentencing Information

- ZAMARRONESTRADA, RAMSES O.
- - DEFENDANT CR/TR

Charge # 5:
50105 - FELONY SEXUAL ASSAULT AGAINST CHILD UNDER 14

- Original Charge
  50105 SEXUAL ASSAULT AGAINST CHILD UNDER 14 (FELONY)
- Indicted Charge
- Amended Charge
- DV Related?
- Modifiers
- Stage Date
- PCN
- PCN Sequence
  5

- Ticket #
- ATN #
- Tracking #
- Place of Offense
  NORTH LAS VEGAS TOWNSHIP
- Offense Location
- Date of Offense
  09/23/2022
- Complainant

Sentencing Information

Load Party Charges 6 through 7 Load All 7 Party Charges

Ticket/Citation

Citation # : - NORTH LAS VEGAS TOWNSHIP

- Offense Date
- 09/23/2022

- Agency
  - NORTH LAS VEGAS POLICE DEPARTMENT
  - Officer
  - Second Officer
  - Complainant

- Speed Cited
- Speed Limit
- Location
- Insured/Proof
- Accident
  - N
  - Work Zone
  - Haz Mat
  - Points
  - Priors
  - License Taken
    - N
    - BAC

- Plate
- State
- Year
- Type
- Style
- Color

Events

Date/Time	Location	Type	Result	Event Judge
07/15/2023 08:00 AM	DEPARTMENT 3	PRETRIAL CUSTODY STATUS HEARING NLV	CRIMINAL HEARING HELD	HARRIS, BELINDA T
07/18/2023 08:30 AM	DEPARTMENT 2	FELONY ARRAIGNMENT NLV	ARRAIGNMENT HEARING HELD	TYRRELL, NATALIE L
08/01/2023 09:30 AM	DEPARTMENT 2	PRELIMINARY HEARING NLV	PRELIMINARY HEARING CONTINUED - DEFENSE ESQ REQUEST	TYRRELL, NATALIE L
10/17/2023 09:30 AM	DEPARTMENT 2	PRELIMINARY HEARING NLV		TYRRELL, NATALIE L

Docket Information

Date	Description	*Docket Text*	Amount Owed	Amount Due
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #1: LEWDNESS W/CHILD UNDER AGE 14, 1ST		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #2: LEWDNESS W/CHILD UNDER AGE 14, 1ST		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #3: SEXUAL ASSAULT AGAINST CHILD UNDER 14		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #4: SEXUAL ASSAULT AGAINST CHILD UNDER 14		

Date	Description	Docket Text	Amount Owed	Amount Due
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #5: SEXUAL ASSAULT AGAINST CHILD UNDER 14		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #6: SEXUAL ASSAULT AGAINST CHILD UNDER 14		
09/23/2022	BAIL AMOUNT	BAIL AMOUNT Charge #7: KIDNAPPING OF MINOR, 1ST DEGREE		
01/17/2023	COMPLAINT SWORN TO & FILED	COMPLAINT SWORN TO AND FILED:		
01/23/2023	ARREST WARRANT ISSUED	Complaint FILED. Upon Motion by State, Arrest Warrant ISSUED. BAIL SET. ARREST WARRANT - CRIMINAL created on: 01/23/2023 For: ZAMARRONESTRADA, RAMSES O. Bond Amt: $ 0.00		
01/23/2023	ALERT INFORMATION	ALERT INFORMATION ARREST WARRANT - CRIMINAL issued on: 01/23/2023 For: ZAMARRONESTRADA, RAMSES O. Bond Amt: $ NO BAIL		
07/14/2023	ALERT INFORMATION	ALERT INFORMATION ARREST WARRANT - CRIMINAL served on: 07/13/2023 For: ZAMARRONESTRADA, RAMSES O.		
07/14/2023	SET FOR COURT APPEARANCE	SET FOR COURT APPEARANCE Event: PRETRIAL CUSTODY STATUS HEARING NLV Date: 07/15/2023 Time: 8:00 am Judge: HARRIS, BELINDA T Location: DEPARTMENT 3 Result: CRIMINAL HEARING HELD		
07/15/2023	OFFICERS PRESENT NLVJC DEPT 3	C. NEWMAN FOR N. L. TYRRELL, JP C. LAURENT, DDA L. AVANTS, DPD M. REHAGEN, CLERK A. HERRERA, SI RECORDED BY JAVS		
07/15/2023	HEARING HELD	HEARING HELD Defendant PRESENT in NLV custody with the assistance of a Spanish interpreter (Booked on warrant of arrest) Valdez-Jimenez hearing heard State requests a $250,000 bail setting with high level electronic monitoring and a no contact order with the victim or any minors. These are extremely violent and troubling allegations. He preyed upon the victim on multiple occasions. He is facing a possible life sentence. He is a danger to the community and a flight risk. Defense requests a low bail setting or electronic monitoring. Defendant has no criminal history. He is not a flight risk. Defense was unable to interview the Defendant due to the language barrier. Defense is unsure of Defendant's employment or contacts with the community. Per Court, the Parties may readdress bail in the future. Court has sufficient information for the bail hearing. Court finds the Defendant to be a danger to the community. Bail Set: $200,000 total bail with high level electronic monitoring. Court admonishes the Defendant to have no contact with the victim or any minors and to stay away from the victim's residence. PASSED for initial arraignment Defendant remanded to CCDC CCDC/$200,000 total bail with EMP HIGH (no contact/stay away)		
07/15/2023	SET FOR COURT APPEARANCE	SET FOR COURT APPEARANCE Event: FELONY ARRAIGNMENT NLV Date: 07/18/2023 Time: 8:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2 Result: ARRAIGNMENT HEARING HELD		
07/18/2023	OFFICERS PRESENT NLVJC DEPT 2	N. L. TYRRELL, JUDGE M. GILES, DDA T. SMITH, DPD M. TORRES, SPANISH INTERPRETER		

Date	Description	Docket Text	Amount Owed	Amount Due
		A. HILL, CLERK RECORDED BY JAVS		
07/18/2023	ARRAIGNMENT HEARING HELD	ARRAIGNMENT HEARING HELD DEFENDANT IS PRESENT IN COURT IN CUSTODY WITH NLV PUBLIC DEFENDER IS APPOINTED PRELIMINARY HEARING IS SET NLV $200K		
07/18/2023	SET FOR COURT APPEARANCE	SET FOR COURT APPEARANCE Event: PRELIMINARY HEARING NLV Date: 08/01/2023 Time: 9:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2		
08/01/2023	OFFICERS PRESENT NLVJC DEPT 2	N. L. TYRRELL, JUDGE M. GILES, DDA R. SAMANO ESQ. FOR O. DECASTROVERDE ESQ. M. BERRY, SPANISH INTERPRETER A. HILL, CLERK RECORDED BY JAVS		
08/01/2023	PRELIMINARY HEARING CONTINUED - DEFENSE ESQ REQUEST	PRELIMINARY HEARING CONTINUED - DEFENSE ESQ REQUEST DEFENDANT IS PRESENT IN COURT IN CUSTODY WITH CCDC R. SAMANO ESQ. SUBSTITUTES IN AS ATTORNEY OF RECORD FOR O. DECASTROVERDE ESQ. PRELIMINARY HEARING IS CALLED OFF DEFENSE REQUESTS CONTINUANCE MOTION GRANTED PRELIMINARY HEARING IS RESET CCDC $200K		
08/01/2023	SET FOR COURT APPEARANCE	SET FOR COURT APPEARANCE Event: PRELIMINARY HEARING NLV Date: 10/17/2023 Time: 9:30 am Judge: TYRRELL, NATALIE L Location: DEPARTMENT 2		

Case Disposition

Disposition	Date	Case Judge
UNDISPOSED		TYRRELL, NATALIE L

EXHIBIT C

NEVADA PRETRIAL RISK (NPR) ASSESSMENT

Defendant's Name: RAMSES ZAMARRON ESTRADA | Booking #: 2954368

Assessment Date: 7-15-2023 | Assessor: NK | County: Clark

Defendant's Name: RAMSES ZAMARRON ESTRADA | DOB: 3-26-1982 | AGE: 41 | Case/Booking #: 23CRN000087-0000

Dept. #: NLV JC-2

Was the defendant interviewed: ☐ Yes ☒ No HOUSED

Address: NOT INTERVIEWED | Contact Phone #: | # of Current Charges: 7

City:

State: Zip:

Most Serious Charge: Sex assit against child < 14 | Total Bail at booking: NO BAIL

SCORING ITEMS		SCORE
1.	Does the Defendant Have a Pending Pretrial Case at Booking? No If yes, list case # and jurisdiction: NONE	0
2.	Age at First Arrest (include juvenile arrests) First Arrest Date 4-24-2012 21 to 35 yrs	1
3.	Prior Misdemeanor Convictions (past 10 years) None	0
4.	Prior Felony/Gross Misd. Convictions (past 10 years) None	0
5.	Prior Violent Crime Convictions (past 10 years) None	0
6.	Prior FTAs (past 24 months) None	0
7.	Substance Abuse (past 10 years) Other	0
8.	Mitigating Verified Stability Factors (limit of -2 pts. total deduction) None verified	0
	TOTAL SCORE:	1

Risk Level: Low | OVERRIDE?: ☒ Yes ☐ No

Override Reason(s): Ser F Cat A

If Other, explain: N/A

Final Recommended Risk Level: Moderate ☐ LOW ☒ MODERATE ☐ HIGHER

Supervisor/Designee Signature: Gretchen Anderson | Date: 7-15-2023

Revised 8.2021

NEVADA PRETRIAL RISK (NPR) ASSESSMENT

Defendant's Name: RAMSES ZAMARRON ESTRADA Booking #: 2854368

Felony/Gross Misdemeanor Convictions: 0

YEAR	STATE	CHARGE

Misdemeanor Convictions: 0

FTAS: 1

Detainers: NO DETAINERS

Pending Cases: NO PENDING CASES

Revised 8.2021

MDC
Name: Ramses Zamarron
Address: 330 S. Casino Center
City/State/Zip: Las vegas Nevada, 89101
Phone: 0002854368 Inmate ID
DEFENDANT IN PROPER PERSON

FILED
NOV 14 2023
CLERK OF COURT

EIGHTH JUDICIAL DISTRICT COURT

CLARK COUNTY, NEVADA

State of Nevada

Plaintiff,

vs.

Ramses Zamarron

Defendant

Case No.: C-23-379841

Dept. No.: 3

December 5, 2023
9:30 AM

MOTION TO DISMISS COUNSEL AND APPOINT ALTERNATE COUNSEL
And Motion to Withdraw Plea

COMES NOW, the Defendant Ramses Zamarron, and moves this Honorable Court to dismiss Defendant's counsel, Francisco Fumo, and appoint alternate counsel to represent Defendant.

This Motion is based upon all papers, pleadings, and documents on file.

POINTS AND AUTHORITIES

It is respectfully requested of this court to grant this Motion to Dismiss Counsel and Appoint Alternate Counsel for the reasons listed below:

RECEIVED
NOV 13 2023
CLERK OF THE COURT

On October 19th I Francisco Vidal was chained to Ramses and witnessed Attorney Francisco Fumo (who is fully aware that Ramses can not Read or write in english) shove a thick several Page document in Ramses lap in open court, Attorney francisco Fumo flipped through the documents to the very last Page and handed Ramses a Pen and Pointed to a black line on the document which was a Plea agreement and told Ramses to sign. Ramses then hesitated, flipped through several Pages of the Plea agreement, and said "can I Please Get a copy of this in aSpanish or have the translater read this to me?" Ramses Attorney laughed and told Ramses "The State, the court, and my office are only allowed to submit documents drafted in English. It's the court's rules, the state nor my office is going to waste resources Producing documents that we are not able to submit, Just for your convienence". Ramses Pleaded Saying" come on man at least translate this for me so I know what I am signing." Ramses Attorney was visibly getting frustrated with Ramses. "I don't have time to sit here and read to you, I have a hearing in front of a very important Judge for a very wealthy client in about 10 minutes so it's up to you to sign this or Spend the rest of your life in Prison, doesn't matter to me." Then before walking off, said "just sign this so I can be Done with this

case". Ramses started helplessly flipping through the pages of text that he could not read desperately Ramses turned to me and said "Please can you tell me what this says". I looked at the page that Ramses had open and begin to tell him It's say's that the state does not oppose Alfred Plea, Ramses with sweat pouring from his forehead desperately said "what does that mean? Before I could respond a court officer said "Hey! If you two Don't Stop talking you will be removed from the court room". I told Ramses in a whisper "sorry" I was then unchained from Ramses and Removed from the courtroom by the court officer that warned me to stop talking. I then ran into Ramses the next morning on the rec yard. Ramses approached me and had asked "what do you think about what you read in my Plea deal? it said "I'll for sure" get Probation right?" I said "Alfred" does not mean "I'll for sure" get Probation, Ramses threw up his hands and said "Why Didn't you tell me! I said "I couldn't the guard separated us after catching me talking to you" I said "look go grab the Plea Agreement and I'll read it for you and explain what it say's. Ramses with both of his hands palming his head said, "I don't have it", I said "he didn't give you

a copy? No!!! Said Ramses. I said, You never had a copy? No! That Attorney told me that I was very lucky to get that "Alfred" deal That Getting the "Alfred" meant "I'll for sure" Get Probation. Said Ramses, I said, Sorry but it does not. Your telling me you never had a copy. Still don't have a copy and your attorney never read it over with you? I Swear to God I never saw those Papers before in my life, He took Paper back as Soon as he got my Signiture and left with them, said Ramses.

Affidavit of: Francisco Vidal

Date: November 5th 2023

x Vidal

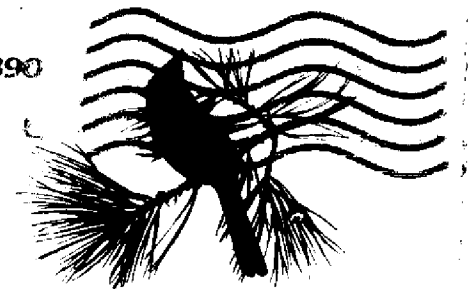
Ramses was told by Fumo that after getting a copy of proposed deal He would one week to consider and understand plea agreement. then Shoved paper in Ramses face and He had to sign plea agreement before been able to read or have it translated from English which Ramses cannot read or write, so He's requesting the deal be printed in Spanish or fully traslated, after receiving a copy in English, and then be given a week, to consider the deal, after reading in Spanish or translated in English a copy of the deal He doesn't have, and still has no idea what is says.

Submitted by: Ramses Zamarron

date: 10/05/2023 X Ramses Z.

Ramses Zamarron/2854368
Clark County Detention Center
PO Box 43059
Las Vegas, NV, 89116

LAS VEGAS NV 890
9 NOV 2023 PM 5



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NOV 13 2023
CLERK OF THE COURT

Court Clerk
200 Lewis Ave
Las Vegas NV 89155

89101-630000

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12/18/2023 3:15 PM
CLERK OF THE COURT

ORD

Lance A. Maningo
MANINGO LAW
Nevada Bar No. 6405
400 South 4th Street, Suite 650
Las Vegas, Nevada 89101
702.626.4646
lance@maningolaw.com
Attorney for Defendant

DISTRICT COURT
CLARK COUNTY, NEVADA

THE STATE OF NEVADA, Plaintiff, vs. RAMSES O. ZAMARRON-ESTRADA, #2854368 Defendant.	CASE NO. C-23-377884-1 DEPT NO. III

ORDER TO PREPARE TRANSCRIPT

Upon the request of the above-named Defendant, RAMSES O. ZAMARRON-ESTRADA, by and through his appointed attorney of record, LANCE A. MANINGO of MANINGO LAW, and good cause appearing therefore,

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MANINGO LAW
400 South 4th Street, Suite 650
Las Vegas, Nevada 89101
www.maningolaw.com

IT IS HEREBY ORDERED that the certified court reporter/recorder, Grecia Snow, prepare at State expense, a transcript of the proceedings of the Initial Arraignment/Entry of Plea hearing held on October 19, 2023, in District Court Department 3 regarding the above-captioned matter.

DATED this ____ day of December, 2023.

Dated this 18th day of December, 2023

DISTRICT COURT JUDGE

DE5 20D 722F 2341
Monica Trujillo
District Court Judge

Respectfully submitted by:
MANINGO LAW

By: */s/ Lance A. Maningo*
Lance A. Maningo
Nevada Bar No. 6405
400 South 4th Street, Suite 650
Las Vegas, Nevada 89101
Attorney for Defendant

MANINGO LAW
400 South 4th Street, Suite 650
Las Vegas, Nevada 89101
www.maningolaw.com

CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

State of Nevada	CASE NO: C-23-377884-1
vs	DEPT. NO. Department 3
Ramses Zamarronestrada	

AUTOMATED CERTIFICATE OF SERVICE

Electronic service was attempted through the Eighth Judicial District Court's electronic filing system, but there were no registered users on the case. The filer has been notified to serve all parties by traditional means.

Electronically Filed
1/10/2024 3:10 PM
Steven D. Grierson
CLERK OF THE COURT

NOCH

DISTRICT COURT

CLARK COUNTY, NEVADA

****

State of Nevada	Case No.: C-23-377884-1
vs	Department 14
Ramses Zamarronestrada	

NOTICE OF CHANGE OF HEARING

The hearing on the Status Check, presently set for January 23, 2024, at 9:30 AM, has been moved to the 23rd day of January, 2024, at 9:30 AM and will be heard by Judge Adriana Escobar.

STEVEN D. GRIERSON, CEO/Clerk of the Court

By: /s/ Jessica Sancen
Jessica Sancen
Deputy Clerk of the Court

CERTIFICATE OF SERVICE

I hereby certify that this 10th day of January, 2024

☒ The foregoing Notice of Change of Hearing was electronically served to all registered parties for case number C-23-377884-1.

☐ I mailed, via first-class, postage fully prepaid, the foregoing Clerk of the Court, Notice of Change of Hearing to:

Steven B Wolfson
Clark County District Attorney
200 Lewis Avenue 3rd Floor
Las Vegas NV 89155

☐ I placed a copy of the foregoing Notice of Change of Hearing in the appropriate attorney folder located in the Clerk of the Court's Office:

Frank J Coumou
Lance A. Maningo
Yasmin Khayyami
Ercan E Iscan
Steven B Wolfson
Michael Donovan Allmon

/s/ Jessica Sancen
Jessica Sancen
Deputy Clerk of the Court

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1/16/2024 11:44 AM
Steven D. Grierson
CLERK OF THE COURT

RTRAN

DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA, Plaintiff, vs. RAMSES O. ZAMARRON-ESTRADA, Defendant.	CASE NO: C-23-377884-1 DEPT. III

BEFORE THE HONORABLE MONICA TRUJILLO,

DISTRICT COURT JUDGE

THURSDAY, OCTOBER 19, 2023

RECORDER'S TRANSCRIPT OF HEARING: INITIAL ARRAIGNMENT

APPEARANCES:

For the State:	MICHAEL D. ALLMON, ESQ. Deputy District Attorney
For the Defendant:	FRANK J. COUMOU, ESQ.
Also present:	ELSA MARSICO Spanish Interpreter

RECORDED BY: GRECIA SNOW, COURT RECORDER

Las Vegas, Nevada, Thursday, October 19, 2023

[Hearing commenced at 11:33 a.m.]

THE COURT: C-23-377884-1, State of Nevada versus Ramses Zamarron-Estrada. On behalf of the State, Mr. --

MR. ALLMON: We did have Ercan coming just a few minutes. I'm sorry.

THE COURT: I got to go. Come on, we got to do this. It's right here.

MR. ALLMON: That's fine. I'll go then.

THE COURT: On behalf of the State, Mr. Allmon. On behalf of the defense, Mr. Coumou. And he is present in custody with the assistance of the Spanish Interpreter.

Madam interpreter, please state your appearance for the record?

THE INTERPRETER: Elsa Marsico, M-a-r-s-i-c-o, Certified Court Interpreter, NVME527, Your Honor.

THE COURT: Thank you. And go ahead with the negotiations?

MR. COUMOU: Judge, today my client will be pleading guilty to the Information on file, which charges him with an attempt lewdness of a minor under 14. At the time of sentencing, the State will make no recommendation.

THE COURT: State, is that correct?

MR. ALLMON: It's correct.

THE COURT: And, Sir, is that your understanding of the negotiations?

THE DEFENDANT: Yes, Your Honor.

THE COURT: What's your true full name?

THE DEFENDANT: Ramses Omar Zamarron-Estrada.

THE COURT: And how old are you, Sir?

THE DEFENDANT: 41.

THE COURT: How far did you go in school?

THE DEFENDANT: High school.

THE COURT: Do you need the interpreter, Sir?

THE DEFENDANT: Sorry, I mean, I'm nervous. I've never been in --

THE COURT: Okay, if you're going to use the interpreter you need to speak to her in Spanish and let her translate.

THE INTERPRETER: Court's indulgence.

[Colloquy between Mr. Coumou and the Defendant]

MR. COUMOU: Sorry about that, Your Honor.

THE COURT: It's okay. How far did you go in school?

THE DEFENDANT: High school.

THE COURT: And is Spanish your native language?

THE DEFENDANT: Yes.

THE COURT: Was the Information that charges you with attempt lewdness with a child under the age of 14, a category B felony, read to you in Spanish?

THE DEFENDANT: Yes.

THE COURT: Do you understand the charge against you?

THE DEFENDANT: Yes.

THE COURT: Did you speak with your attorney about your case and any possible defenses?

THE DEFENDANT: Yes.

THE COURT: Are you under the influence of any medications or substances that would prevent you from understanding what's happening here today?

THE DEFENDANT: No.

THE COURT: How do you plead to attempt lewdness with a child under the age of 14?

THE DEFENDANT: Guilty by *Alford*.

THE COURT: And are you making this plea freely and voluntarily?

THE DEFENDANT: Yes.

THE COURT: Has anyone forced you, or threatened you, or anyone close to you to get you to enter into the plea?

THE DEFENDANT: No.

THE COURT: Did anyone make you any promises other than what's in the agreement to get you to enter into the plea?

THE DEFENDANT: No.

THE COURT: Did you read the entire agreement?

THE DEFENDANT: Yes.

THE COURT: Do you understand the terms?

THE DEFENDANT: Yes.

THE COURT: Did your attorney answer any questions you may have had about the agreement?

THE DEFENDANT: Yes.

THE COURT: Did you voluntarily sign the English version on page 6?

THE DEFENDANT: Yes.

THE COURT: You understand by pleading guilty, you're giving up certain constitutional rights listed in the agreement?

THE DEFENDANT: Yes.

THE COURT: You also understand you're giving up certain appellant rights listed in the agreement?

THE DEFENDANT: Yes.

THE COURT: You understand if you're not a United States citizen, entering into this plea can have negative immigration consequences, including deportation?

THE DEFENDANT: Yes.

THE COURT: And you understand as a result of this plea, the Court must sentence you to a minimum term of 2 years, maximum term of 20 years in the Nevada Department of Corrections?

THE DEFENDANT: Yes.

THE COURT: You also understand that you will only be eligible for probation if the psychosexual evaluation determines you are not a high risk to reoffend?

THE DEFENDANT: Yes.

THE COURT: You understand that the Court must include as

part of your sentence a special sentence of lifetime supervision that will begin after any period of probation or any term of imprisonment or upon release to parole?

THE DEFENDANT: Yes.

THE COURT: And the Court must also order that you register as a sex offender within 48 hours of sentencing or your release from custody?

THE DEFENDANT: Yes.

THE COURT: You understand that sentencing is solely up to the Court, and no one can make you any promises of leniency?

THE DEFENDANT: I understand, yes.

THE COURT: Do you have any questions for me or your attorney before I accept your plea?

THE DEFENDANT: Am I going to have a hearing for the sentencing, Your Honor?

THE COURT: Yes. I'm going to give it to you today – the date. Any other questions?

THE DEFENDANT: Would you be so kind to give me the possibility to be released, Your Honor?

THE COURT: That's not part of the negotiation, so if your attorney wants to file a motion, if he hasn't already -- I don't know the history of the case -- so he can file a written motion.

THE DEFENDANT: I understand.

THE COURT: All right. Thank you.

State, are you ready to put the facts on?

MR. ALLMON: Yes, Your Honor.

THE COURT: Okay, go ahead.

MR. ALLMON: Your Honor, the facts for the *Alford* plea, on or about September 23rd, 2018 and December 31st, 2020, in Clark County, Nevada, the Defendant did willfully, lewdly, unlawfully, and feloniously commit a lewd or lascivious act upon the body of J.T., a child under the age of 14 years, by touching and/or rubbing, and/or fondling J.T.'s breast and by inserting his tongue into her mouth or kissing her. These acts done with the intent of arousing, appealing to, or gratifying the lust, passions, or sexual desires of the Defendant or J.T.

Additionally, Defendant did willfully, unlawfully, and feloniously commit digital penetration upon J.T., was under the age of 14 years by inserting his fingers into the anal opening of J.T., committing sexual intercourse by inserting his penis into the genital opening of J.T. and committing anal intercourse by inserting his penis in the anal opening of J.T. on two occasions.

Additionally, Defendant did willfully, unlawfully, and feloniously lead, take, entice, or carry away, and/or detain J.T. by taking her to a secluded location with the intent to commit lewdness and or sexual assault on J.T.

THE COURT: Sir, you understand the Court will rely on the facts that's presented by the State to determine there's a factual basis for your plea?

THE DEFENDANT: Yes, I understand.

THE COURT: And have you made or the decision that it's in

your best interest to accept this type of negotiation?

THE DEFENDANT: I don't know how to answer that.

THE COURT: Do you think it's in your best interest to enter this plea today?

THE DEFENDANT: May I ask something?

[Colloquy between Mr. Coumou and the Defendant]

THE COURT: All right. So, Sir, have you decided it's in your best interest to accept this negotiation?

THE DEFENDANT: Yes, Your Honor.

THE COURT: And is one of those reasons to avoid the possible harsher punishment of going to trial on the original charges?

THE DEFENDANT: Yes.

THE COURT: All right. The Court finds that your plea is freely and voluntarily given, that you understand the nature and consequence of your plea. I'm going to refer this to the Department of Parole and Probation so they can prepare your PSI.

Here's your sentencing date, Sir.

THE CLERK: November 30th at 9:30.

THE COURT: Thank you.

Thank you, Madam Interpreter.

MR. COUMOU: Judge, do you want me to file a motion to seek a lower bail because the bail was set at a significantly higher charges?

THE COURT: Yes, a written motion.

MR. COUMOU: Okay. I will, Your Honor.

THE COURT: Thank you.

MR. COUMOU: Thank you.

THE COURT: Have a good day.

MR. COUMOU: You too, Your Honor.

[Hearing concluded at 11:44 a.m.]

* * * * * *

ATTEST: I do hereby certify that I have truly and correctly transcribed the audio/video proceedings in the above-entitled case to the best of my ability.



Grecia Snow
Court Recorder/Transcriber

THIS SEALED
DOCUMENT,
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228 - 237
WILL FOLLOW VIA
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Electronically Filed
04/17/2024 2:39 PM
CLERK OF THE COURT

JOCP

DISTRICT COURT

CLARK COUNTY, NEVADA

THE STATE OF NEVADA,

Plaintiff,

-vs-

RAMSES O. ZAMARRON-ESTRADA, #2854368

Defendant.

CASE NO. C-23-377884-1

DEPT. NO. XIV

JUDGMENT OF CONVICTION

(PLEA OF GUILTY-ALFORD)

The Defendant previously appeared before the Court with counsel and entered a plea of guilty pursuant to North Carolina v. Alford, 400 U.S. 25 (1970), to the crime of ATTEMPT LEWDNESS WITH A CHILD UNDER THE AGE OF 14 (Category B Felony) in violation of NRS 201.230(2); thereafter, on the 2nd day of April, 2024, the Defendant was present in court for sentencing with counsel, FRANK COUMOU, Esq., and good cause appearing,

THE DEFENDANT IS HEREBY ADJUDGED guilty of said offense and, in addition to the $25.00 Administrative Assessment Fee, $1,962.15 Psychosexual Evaluation Fee and $150.00 DNA Analysis Fee including testing to determine genetic

markers plus $3.00 DNA Collection Fee, the Defendant is sentenced as follows: a MAXIMUM of NINETY-SIX (96) MONTHS with a MINIMUM parole eligibility of THIRTY-SIX (36) MONTHS in the Nevada Department of Corrections (NDC); with ONE HUNDRED TWENTY-ONE (121) DAYS credit for time served.

FURTHER ORDERED, a SPECIAL SENTENCE of LIFETIME SUPERVISION is imposed to commence upon release from any term of imprisonment, probation or parole. In addition, before the Defendant is eligible for parole, a panel consisting of the Administrator of the Mental Health and Development Services of the Department of Human Resources or his designee; the Director of the Department of corrections or his designee; and a psychologist licensed to practice in this state; or a psychiatrist licensed to practice medicine in Nevada must certify that the Defendant does not represent a high risk to re-offend based on current accepted standards of assessment.

ADDITIONALLY, the Defendant is ORDERED to REGISTER as a sex offender in accordance with NRS 179D.460 within FORTY-EIGHT (48) HOURS after any release from custody.

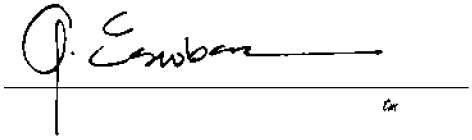
COURT SUGGESTED the following CONDITIONS:

1. Defendant to enroll and complete a sex offender course.
2. Defendant to follow ICE Directives.
3. Defendant to have no contact with minor children under the age of 18.

COURT ADDITIONALLY ORDERED case CLOSED.

BOND, if any, EXONERATED.

Dated this 17th day of April, 2024



515 B92 A262 C944
Adriana Escobar
District Court Judge

CSERV

DISTRICT COURT
CLARK COUNTY, NEVADA

State of Nevada	CASE NO: C-23-377884-1
vs	DEPT. NO. Department 14
Ramses Zamarronestrada	

AUTOMATED CERTIFICATE OF SERVICE

This automated certificate of service was generated by the Eighth Judicial District Court. The foregoing Judgment of Conviction was served via the court's electronic eFile system to all recipients registered for e-Service on the above entitled case as listed below:

Service Date: 4/17/2024

Lance Maningo	lance@maningolaw.com
Kelly Valenti	kelly@maningolaw.com
Yasmin Khayyami	yasmin@maningolaw.com

PP DA for

FILED
MAR 11 2025
CLERK OF COURT

IN THE 8th JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA IN AND FOR THE COUNTY OF Clark

April 1, 2025
9:30 AM

The State of Nevada
Petitioner/Plaintiff,
vi.
Ramses O. Zamarron-estrada
Respondent/Defendant.

Case No. C-23-377584-1
Dept. No. XIV
Docket No.

Hearing Requested

MOTION FOR WITHDRAWAL OF ATTORNEY OF RECORD OR IN THE ALTERNATIVE, REQUEST FOR RECORDS/COURT CASE DOCUMENTS

COMES NOW, Petitioner/Plaintiff, O Zamarron-estrada, pro per, and respectfully moves tnis Honorable Court for it's Order withdrawing Frank Cuomo, Esq., as the Attorney of Record in the above-entitled matter.

This Motion is made and based upon Nev. Rev. Stat. 7.055, and Nev. Sup. Ct. Rules 166(4), 173, 176, and 203, and Rules 11 and 20 of the Rules of the District Courts of the State of Nevada.

POINTS AND AUTHORITIES

Nev. Rev. Stat. 7.055, provides that:

> An attorney who has been discharged by his client shall, upon demand...immediately deliver to the client all papers, documents, pleadings and items of tangible personal property which belong to or were prepared for that client.

See also Nev. Sup. Ct. Rule 166(4):

> Upon termination of representation, a lawyer shall take steps to the extent reasonably practicable to protect a client's interests, such as ...surrendering papers and property to which the client is entitled...".

Petitioner/Plaintiff would respectfully point out to this Court and the attorney of record that there

RECEIVED
MAR 10 2025
CLERK OF THE COURT

is controlling law on this issue. This citation of authority is precautionary only. In the cases of **In Re Yount**, 93 Ariz. 322, 380 P.2d 780 (1963), and **State v. Alvey**, 215 Kan. 460, 524 P.2d 747 (1974), both cases dealt with a factual situation involving a withdrawn attorney refusing to deliver to a former client his documents after being requested to do so by the client. The Court in **Yount**, supra, ordered the attorney disbarred, while in **Alvey**, supra, the Court had the attorney censored.

In most situations it is obviously not necessary to notify the parties when the attorney withdraws from a case, but when the client wishes to remove his attorney and represent himself in person, it is required by these Statutes and Rules that the client request the Court of action to issue a certificate releasing the attorney of record. Under such statutes it is necessary for the party to present his request for the change in order for the court in making an order withdrawing the attorney of record, and to make formal demand to the Attorney for the return of all papers and property.

Therefore, let this Court be so notified that this is the desire of the Petitioner/Plaintiff herein that the aforementioned attorney of record be withdrawn and the same shall be for any other attorney(s) which could possibly be subscribed and documented as attorney(s) of record in this case, so that further actions in the above-entitled cause can be conducted by the Petitioner/Plaintiff in proper person.

Further, Petitioner/Plaintiff hereby makes formal demand upon Frank Curran _____, Esq., for the return of his entire file, including, but not limited to all papers, documents, pleadings and items of tangible personal property which belong to or were prepared on my behalf to me at the address set forth in this pleading.

Further, it is requested of this Court that it issue an Order directing the named attorney of record that he turn over to the Petitioner/Plaintiff the entire case file, without costs, including, but not limited to, the trial transcripts or guilty plea transcript, all briefs on appeal, and all other papers and police reports relating to this matter, so that Petitioner/Plaintiff may prosecute an appeal/post-conviction with a minimum amount of delay.

CONCLUSION

WHEREFORE, all of the above stated reasons, Petitioner/Plaintiff respectfully requests this Honorable Court to grant his Motion for Withdrawal of Attorney of Record in accordance with this Court's fair and just consideration of the facts of the case.

DATED this 5 day of March, ~~200~~ 2025

Respectfully submitted,

James B.

Petitioner/Plaintiff

CERTIFICATE OF SERVICE

I ~~hereby certify pursuant~~ to N.R.C.P. 5(b) that I am the Petitioner/Plaintiff in the foregoing Notice of Motion and Motion for Withdrawal of Attorney of Record or in the Alternative, Request for Records/Court Case Documents on this ____ day of _____, 200__, I did serve a true and correct copy of the above mentioned document, by giving it to a prison official at the Ely State Prison to deposit in the U.S. Mail, sealed in an envelope, postage pre-paid, and addressed as follows:

CCDA
200 Lewis Ave
Las Vegas NV.
89155

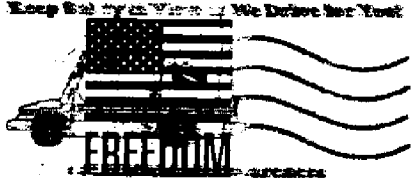
DATED this 5 day of March, ~~200~~ 2025

James B.

Petitioner/Plaintiff

Ramses Zamarron Estrada #1283027
ELY NV 89301
Ely state Prison
PO Box 1989

LAS VEGAS NV 890
7 MAR 2025 PM 3 L



200 Lewis Avenue 3RD FLOOR
LAS VEGAS NV 89155

89101-630000

244

ELY STATE PRISON
MAR 05 2025
U4

EIGHTH JUDICIAL DISTRICT COURT
CLERK OF THE COURT
REGIONAL JUSTICE CENTER
200 LEWIS AVENUE, 3rd FL
LAS VEGAS, NEVADA 89155-1160
(702) 671-4554

Steven D. Grierson
Clerk of the Court

Anntoinette Naumec-Miller
Court Division Administrator

March 25, 2025

Attorney: Frank J Coumou
PO Box 552212
Las Vegas NV 89155-2212

Case Number: C-23-377884-1
Department: Department 27

Defendant: Ramses O. Zamarronestrada

Attached are pleadings received by the Office of the District Court Clerk which are being forwarded to your office pursuant to Rule 3.70.

Pleadings: **Motion For County Jail Time**

Rule 3.70. Papers which May Not be Filed

Except as may be required by the provisions of NRS 34.730 to 34.830, inclusive, all motions, petitions, pleadings or other papers delivered to the clerk of the court by a defendant who has counsel of record will not be filed but must be marked with the date received and a copy forwarded to the attorney for such consideration as counsel deems appropriate. This rule does not apply to applications made pursuant to Rule 7.40(b)(2)(ii).

Cordially yours,

DC Criminal Desk # 7

Deputy Clerk of the Court

PLEADING CONTINUES IN NEXT VOLUME