

COMMONWEALTH OF PENNSYLVANIA

vs

KIM MONROE, Defendant

*

No. 1 Criminal 2011

*

*

CRIMINAL HOMICIDE

STIPULATED FACTS

Kim Monroe and George Monroe were married on March 1, 2010. On February 14, 2011, at 10:32 p.m., a call was received at the Emergency Control Center on the 911 line for the Pocono Police Department. The female caller said "I just shot my cheating husband," and gave the address of 1799 Lamont Street. Detective Sal(ly) Palmer responded to the call and reached the building at 10:38 p.m.

Detective Palmer (hereafter "Palmer") met Kim Monroe (hereafter "Defendant") at the door at the end of the front steps to her second floor apartment. The Defendant led the Palmer to a bedroom. When Palmer entered the bedroom a fully clothed man was discovered lying face down on the bed, covered with a light blanket. The blanket had 3 bullet holes in it and was soaked in blood. The night before the shooting, the Defendant placed the handgun in the kitchen.

Palmer determined that the man on the bed was dead and asked the Defendant who he was and what happened. The Defendant responded "I shot my husband," and pointed to a dresser near the bed on which was a handgun. Palmer read the Defendant her rights and placed her under arrest.

Later, at the police station, the Defendant waived her rights. Palmer questioned her and she signed a handwritten statement. Following her arrest, the Defendant was released on bail. She met with Terry Stein, the director of the Pocono Women's Shelter, following her release on bail on February 19, 2011. She was directed to go to Dr. Pat Bergan (hereafter "Bergan") and met with Bergan on February 20, 2011.

A preliminary hearing was held on February 25, 2011 and a charge of Criminal Homicide was bound over for Court. The District Attorney filed a Criminal Information dated July 1, 2011 charging that the Defendant shot the decedent, her husband, 3 times on February 14, 2011 causing his death. The criminal information charges both 1st degree Murder and 3rd degree murder.

The decedent had purchased a \$300,000.00 life insurance policy on Kim Monroe's life through Monroe Insurance Solutions, Inc. The beneficiary on the policy was Sarah Speaks.

A civil lawsuit seeking monetary damages of \$4 million was filed by the Estate of George Monroe on behalf of his heirs against Kim Monroe and The Pocono Women's Shelter. The civil trial is set for January, 2012.

The cause of death is stipulated to be gunshot wounds to the decedent's back. It is stipulated that Dr. Bergan is an expert in the field of "Battered Woman Syndrome".

The statements of all witnesses are affidavits given under oath.

The authenticity of the criminal record of George Monroe is stipulated.

It has been stipulated that, in lieu of the actual handgun being present in the courtroom, a photo of the handgun is the best evidence.

WITNESSES:

The Commonwealth must call the following 3 witnesses:

- 1). Detective Sal(Iy) Palmer of the Pocono Police Department
- 2). Terry Stein, Director of the Pocono Women's Shelter
- 3). Alex(is) Chavez, Kim Monroe's brother

The Defense must call the following 3 witnesses:

- 1). Kim Monroe
- 2). Fran Nilva, Insurance Agent
- 3). Dr. Pat Bergan, Expert

EXHIBITS:

The following are exhibits that either the Commonwealth or the Defense can use, provided the rules of evidence are fulfilled:

Statement of Kim Monroe

Photo of Monroe's apartment

Diagram of apartment

Photo of gun

Criminal Rap Sheet of George Monroe

Insurance Beneficiary Designation