

SIM GILL, Bar No. 6389  
District Attorney for Salt Lake County  
MARC C. S. MATHIS, Bar No. 11248  
JOSHUA N. GRAVES, Bar No. 11393  
HEATHER A. LINDSAY, Bar No. 15659  
Deputy District Attorneys  
35 East 500 South  
Salt Lake City, UT 84111  
Telephone: (385) 468-7600

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IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT  
IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

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THE STATE OF UTAH,  
Plaintiff,

vs.

**AYOOLA ADISA AJAYI,**  
**DOB: 04/22/1988,**  
**AKA: AJ**  
**547 North 1000 West**  
**SALT LAKE CITY, UT 84116**  
**SO# 416400**

Defendant.

Screened by: MARC C. S. MATHIS  
Assigned to: MARC C. S. MATHIS  
JOSHUA N. GRAVES  
HEATHER A. LINDSAY

**INFORMATION**

BAIL: NO BAIL

Warrant/Release: WARRANT

Case No.

DAO # 19016946

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The undersigned Detective J. Robison with the SALT LAKE CITY POLICE DEPARTMENT, Agency Case No. 19-130235, upon a written declaration states on information and belief that the defendant, AYOOLA ADISA AJAYI, committed the crimes of:

COUNT 1

AGGRAVATED KIDNAPPING, 76-5-302 UCA, a First Degree Felony, as follows: That on or about March 10, 2018 at 547 North 1000 West, in Salt Lake County, State of Utah, the defendant did , in the course of committing unlawful detention or kidnapping,

(a) possess, use, or threaten to use a dangerous weapon as defined in Utah Code Section 76-1-601; or

(b) act with intent:

(i) to hold the victim for ransom or reward, or as a shield or hostage, or to compel a third person to engage in particular conduct or to forbear from engaging in particular conduct;

- (ii) to facilitate the commission, attempted commission, or flight after commission or attempted commission of a felony;
- (iii) to hinder or delay the discovery of or reporting of a felony;
- (iv) to inflict bodily injury on or to terrorize the victim or another;
- (v) to interfere with the performance of any governmental or political function; or
- (vi) to commit a sexual offense as described in Title 76, Chapter 5, Part 4 of the Utah Code (Sexual Offenses).

COUNT 2

FORCIBLE SEXUAL ABUSE, 76-5-404 UCA, a Second Degree Felony, as follows: That on or about March 10, 2018 at 547 North 1000 West, in Salt Lake County, State of Utah, the defendant did, where the victim was 14 years of age or older, touch the anus, buttocks, pubic area, or any part of the genitals of another, or touch the breasts of a female, or otherwise took indecent liberties with another, with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desires of any person, without the consent of the other, regardless of the sex of any participant.

COUNT 3

FORCIBLE SEXUAL ABUSE, 76-5-404 UCA, a Second Degree Felony, as follows: That on or about March 10, 2018 at 547 North 1000 West, in Salt Lake County, State of Utah, the defendant did, where the victim was 14 years of age or older, touch the anus, buttocks, pubic area, or any part of the genitals of another, or touch the breasts of a female, or otherwise took indecent liberties with another, with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desires of any person, without the consent of the other, regardless of the sex of any participant.

COUNT 4

FORCIBLE SEXUAL ABUSE, 76-5-404 UCA, a Second Degree Felony, as follows: That on or about March 10, 2018 at 547 North 1000 West, in Salt Lake County, State of Utah, the defendant did, where the victim was 14 years of age or older, touch the anus, buttocks, pubic area, or any part of the genitals of another, or touch the breasts of a female, or otherwise took indecent liberties with another, with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desires of any person, without the consent of the other, regardless of the sex of any participant.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES:

Detective J. Robison, E.C., L.G., R.R., and K.W.

DECLARATION OF PROBABLE CAUSE:

Your declarant bases this information upon the following:

The statement of K.W. that prior to March 10, 2018, she began communicating with Defendant, AYOOLA ADISA AJAYI, after meeting him through the use of a dating app. Following an in-person meeting, AJAYI invited K.W. to his house and offered to cook her dinner. On or about March 10, 2018, K.W. went to AJAYI'S residence located in Salt Lake County. Following dinner, K.W. and AJAYI began watching television on AJAYI'S couch at which point AJAYI placed his arm around K.W. and began kissing her. K.W. states that AJAYI began "intensely" kissing her and trying to touch her "between her legs." When K.W. attempted to stop AJAYI and get away, he got on top of K.W. and pinned her down on the couch against her will. AJAYI placed his hand on K.W.'s thigh and skirt and began grinding on her, pressing his penis against her vagina over the clothes. AJAYI then pulled K.W.'s shirt and bra down exposing her left breast. AJAYI grabbed K.W.'s left breast with his hand and then began biting her nipple and breast. K.W. stated that AJAYI bit her breast and nipple at least three times causing her significant pain, and left bruising and bite marks.

REQUEST FOR ISSUANCE OF A WARRANT:

The State hereby requests that the Court issue a Warrant of Arrest in the above-entitled case for the following reasons:

- 1) The defendant is currently in jail.
- 2) To prevent risk of injury to a person or property.
- 3) To protect the public safety and welfare of the community or an individual.
- 4) To secure the appearance of the accused.

Pursuant to Utah Code Annotated § 78B-18a-106 (2018) I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Signed on the 20<sup>TH</sup> day of AUGUST, 2019,  
in Salt Lake County, Utah



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Detective. J. Robison S. BIGELOW MPS  
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney



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Deputy District Attorney  
20th day of August, 2019  
LAS / DAO # 19016946

OTHER PENDING CASES FOR THE DEFENDANT

<u>Court</u>	<u>Court Case #</u>	<u>Trial Judge</u>	<u>DAO#</u>	<u>Charge</u>
3 <sup>rd</sup> Dist.-SLC	191906862	Judge V. Trease	19014106	Agg. Murder-F1 Agg Kidnap-F1 Obst. Justice-F2 Desecr. Body-F3
3 <sup>rd</sup> Dist.-SLC	191908086	Judge V. Trease	19016327	Sex Ex. Minor-F2 X19