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

THE STATE OF UTAH,

Plaintiff,

vs.

KEVIN WAYNE BILLINGS,
DOB: 12/14/1953,
4102 WEST WENDY AVENUE
WEST VALLEY CITY, UT 84120
OTN 56683501
SO# 410135
Booking# 18040500

Defendant.

Screened by: HOMICIDE UNIT
Assigned to: CHOU CHOU COLLINS,
BRADFORD D. COOLEY, and
VICTORIA A. TURNER

INFORMATION

BAIL NOT ALLOWED

Warrant/Release: IN SALT LAKE COUNTY
JAIL

Case No.

DA Case No. 18018806

The undersigned Detective T. SAYES with the Salt Lake City Police Department, in reference to agency case no. 18-144338, upon a written declaration states on information and belief that the defendant, KEVIN WAYNE BILLINGS, committed the crimes of:

COUNT 1

CRIMINAL HOMICIDE, AGGRAVATED MURDER, 76-5-202 UCA, First Degree Felony, as follows: That on or about August 09, 2018 at 4102 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant intentionally or knowingly caused the death of Jill Robinson under any of the following circumstances: the actor knowingly created a great risk of death to a person other than the victim and the actor; or the homicide was committed incident to an act, scheme, course of conduct, or criminal episode during which the actor committed or attempted to commit Aggravated Arson or Arson; or the homicide was committed incident to one act, scheme, course

of conduct, or criminal episode during which the actor committed the crime of abuse or desecration of a dead human body as defined in Subsection 76-9-704(2)(e); or the homicide was committed for the purpose of: preventing a witness from testifying; preventing a person from providing evidence or participating in any legal proceedings or official investigation; retaliating against a person for testifying, providing evidence, or participating in any legal proceedings or official investigation; or disrupting or hindering any lawful governmental function or enforcement of laws.

COUNT 2

AGGRAVATED ARSON, 76-6-103 UCA, First Degree Felony, as follows: That on or about August 09, 2018 at 4112 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant, by means of fire or explosives, intentionally and unlawfully damaged: a habitable structure; or any structure or vehicle when any person not a participant in the offense was in the structure or vehicle.

COUNT 3

ARSON, 76-6-102(1)(b) UCA, Second Degree Felony, as follows: That on or about August 09, 2018 at 4102 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant unlawfully and intentionally damaged the property of another by means of fire or explosives, and the damage caused was or exceeded \$5,000 in value.

COUNT 4

ABUSE OR DESECRATION OF A HUMAN BODY, 76-9-704 UCA, Third Degree Felony, as follows: That on or about August 09, 2018 at 4102 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant intentionally and unlawfully disturbed, moved, removed, concealed, or destroyed a dead human body or any part of it.

COUNT 5

POSSESSION OF EXPLOSIVE PARTS, 76-10-306 UCA, Third Degree Felony, as follows: That on or about August 09, 2018 at 4102 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant knowingly, intentionally, or recklessly possessed any explosive, chemical, or incendiary parts.

COUNT 6

POSSESSION OF EXPLOSIVE PARTS, 76-10-306 UCA, Third Degree Felony, as follows: That on or about August 09, 2018 at 4102 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant knowingly, intentionally, or recklessly possessed any explosive, chemical, or incendiary parts.

COUNT 7

POSSESSION OF EXPLOSIVE PARTS, 76-10-306 UCA, Third Degree Felony, as follows: That on or about August 09, 2018 at 4102 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant knowingly, intentionally, or recklessly possessed any explosive, chemical, or incendiary parts.

COUNT 8

POSSESSION OF EXPLOSIVE PARTS, 76-10-306 UCA, Third Degree Felony, as follows: That on or about August 09, 2018 at 4102 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant knowingly, intentionally, or recklessly possessed any explosive, chemical, or incendiary parts.

COUNT 9

POSSESSION OF EXPLOSIVE PARTS, 76-10-306 UCA, Third Degree Felony, as follows: That on or about August 09, 2018 at 4102 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant knowingly, intentionally, or recklessly possessed any explosive, chemical, or incendiary parts.

COUNT 10

AGGRAVATED CRUELTY TO AN ANIMAL, 76-9-301(4) UCA, Class A Misdemeanor, as follows: That on or about August 09, 2018 at 4112 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant intentionally or knowingly killed or caused to be killed an animal without having a legal privilege to do so.

COUNT 11

AGGRAVATED CRUELTY TO AN ANIMAL, 76-9-301(4) UCA, Class A Misdemeanor, as follows: That on or about August 09, 2018 at 4112 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant intentionally or knowingly killed or caused to be killed an animal without having a legal privilege to do so.

COUNT 12

AGGRAVATED CRUELTY TO AN ANIMAL, 76-9-301(4) UCA, Class A Misdemeanor, as follows: That on or about August 09, 2018 at 4112 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant intentionally or knowingly killed or caused to be killed an animal without having a legal privilege to do so.

COUNT 13

AGGRAVATED CRUELTY TO AN ANIMAL, 76-9-301(4) UCA, Class A Misdemeanor, as follows: That on or about August 09, 2018 at 4112 West Wendy Avenue, in Salt Lake County, State of Utah, the defendant intentionally or knowingly killed or caused to be killed an animal without having a legal privilege to do so.

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

R. Alexander, H. Arguello, B. Beal, W. Bennett, S. Billings, M. Cazares, T. Chopp, S. Drake, J. Flores, I. Garcia-Gonzalez, J. Gonzales, N. Hill, R. Huffman, B. Keane, B. Kelly, D. Kelly, C. Kenney, M. Kiem, J. Kilgore, D. Loyola, R. Luke, G. Madrigal-Olvera, E. Madsen, R. Martinez, S. Mayfield, Z. Michalicek, T. Mitchell, W. Moon, M. Padilla, C. Person, J. Robinson, T. Sayes, S. Sheen, W. Smith, J. Spangenberg, M. Throckmorton, J. Turner, N. Wiley, and S. Zini.

DECLARATION OF PROBABLE CAUSE:

Your Declarant, Detective T. Sayes with the Salt Lake City Police Department, based on information in report number 2018-144338, interviews of witnesses, and investigation by law enforcement officers, states as follows:

On August 9, 2018 at 10:21 a.m., police and the fire department were called to 4102 West Wendy Avenue in Salt Lake County, Utah on a report of multiple fires and a shooting. Upon arrival, officers observed a marked West Valley City Community Preservation, Code Enforcement Ford F150 truck fully engulfed in fire, the deceased body of a female wearing an official West Valley City Ordinance Enforcement uniform and badge in the driveway, and the neighboring residence at 4112 West Wendy Avenue on fire.

The deceased female was identified as West Valley City Code Enforcement Officer Jill Robinson. Medics noticed Ms. Robinson had burn marks on her lower extremities consistent with an accelerant or other flammable substance being applied to the body, then lit on fire. The burns were inconsistent with fire spread through radiant heating.

Ryan Luke stated he was working in his home office at 4112 West Wendy Avenue, when he heard an explosion and felt the concussion from the blast. Mr. Luke went downstairs and saw thick black smoke coming through his back window, which had been broken out. Mr. Luke exited his home and saw that a truck in front of the house of his neighbor, KEVIN WAYNE BILLINGS, was on fire and observed Ms. Robinson's body in BILLINGS' driveway. Mr. Luke stated BILLINGS recently contacted his wife and accused them of calling Code Enforcement on him. Mr. Luke suffered smoke inhalation and minor lacerations to his hands due to the fire at his residence. Mr. Luke had five dogs and one cat. The remains of four dogs were located in Mr. Luke's residence.

Officers and firefighters found a large hole cut meticulously through the chain link fence separating Mr. Luke's property from BILLINGS' property. Mr. Luke was asked about the hole and he stated the hole was not present earlier that morning. Mr. Luke noted that he had seen BILLINGS clearing the thick vegetation from that portion of the fence several days prior. Officers found bolt cutters on a shelf on BILLINGS' property near the hole in the fence.

R. Alexander lives across the street from BILLINGS. Mr. Alexander reported that he heard a "pop" and looked out his window. Mr. Alexander stated he saw a female lying in the driveway at 4102 West Wendy Avenue. Mr. Alexander stated BILLINGS walked to the marked West Valley City truck parked in front of the residence, holding what appeared to be a hammer. Mr. Alexander stated he heard another popping sound, which he believed to be a window in the truck being broken out. Mr. Alexander then saw BILLINGS walk back to his house and reemerge with a five-gallon gas can. BILLINGS then "spilled" something on the female and went to the West Valley City truck. Mr. Alexander stated he saw flames coming from the truck. Mr. Alexander stated BILLINGS then stood over the female for a few seconds, as if he was trying to set her on fire. Mr. Alexander noticed the neighboring house at 4112 West was also on fire. Mr. Alexander stated he called 911.

S. Zini lives south of BILLINGS. Ms. Zini stated she heard a "boom" and went outside to investigate. Ms. Zini saw BILLINGS pouring gasoline in the gutter next to a marked West Valley City truck parked in front of his residence. Ms. Zini stated BILLINGS then lit the gasoline on fire. Ms. Zini stated she walked toward the truck and saw the body of a female in the driveway. Ms. Zini checked on the female and determined she was deceased. Ms. Zini stated BILLINGS was sitting on his walker in his driveway with a "smirk." Ms. Zini stated she asked BILLINGS, "Why did you shoot her?" BILLINGS responded, "I've had all the harassment I can take." Ms. Zini then noticed smoke coming from the residence at 4112 West and a male yelling, "My dogs! My dogs!"

Officers spoke with Stephanie Billings, BILLINGS' daughter. Ms. Billings stated she spoke to her father earlier in the morning of August 9, 2018, and he informed her he had a meeting with Code Enforcement scheduled for 10:00 a.m. that morning. Ms. Billings was under the impression the meeting was to be at her father's house. Ms. Billings was aware that BILLINGS had received several complaints in the mail regarding the condition of his yard and unregistered vehicles on his property.

During a search of BILLINGS' residence, officers found three spools of detonation cord (over 1000 yards in length) and a cardboard box containing over 400 blasting caps with altered shock tubes. Ms. Billings was aware BILLINGS possessed the detonation cord and stated BILLINGS used the detonation cord as rope while camping.

Officers spoke with C. Kenney, West Valley City Ordinance Enforcement Supervisor. Ms. Kenney researched Ms. Robinson's work records and found Ms. Robinson mailed BILLINGS a "Notice of Violation" letter dated July 24, 2018. The letter detailed the ordinance violations at BILLINGS' residence and included instructions to request an inspection and obtain a 'notice of compliance' from an ordinance officer by August 6, 2018. The letter emphasized that it was BILLINGS' responsibility to contact the West Valley City Ordinance Enforcement office to schedule a compliance inspection. The letter stated that failure to do so would result in a daily fine of \$50.00 beginning August 7, 2018. Ms. Kenney stated Ms. Robinson would have no reason to go back to BILLINGS' residence unless summoned by the home owner. Officers reviewed BILLINGS' phone records which show BILLINGS placed a call to Ms. Robinson's office number on August 8, 2018.

Fire Investigator P. Larsen examined the residence at 4112 West Wendy Avenue and stated the burn patterns indicated the fire started outside and moved inward. The burn patterns indicated the fire originated on the lower portion of the back deck on the exterior of the house. A propane torch and five-gallon gas cans were located in close proximity to the area of the fire origination, on BILLINGS' property just outside the hole in the fence. The fire spread to a nearby detached garage on Mr. Luke's property. Both the residence and detached garage were a total loss due to the fire damage.

An accelerant detection dog searched the remains of the West Valley City F150 truck. The dog alerted to the possible presence of ignitable liquid on debris near the back passenger side, debris near the driver's door, and on the back bumper. The vehicle was a total loss due to the fire damage. The truck and its equipment was valued at approximately \$32,500.

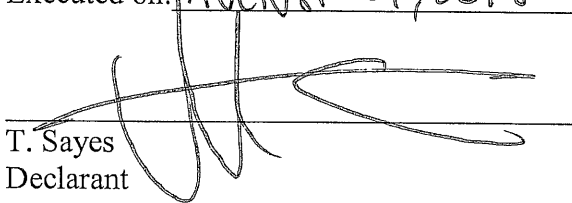
On August 10, 2018, Dr. Z. Michalicek, Assistant Medical Examiner with the Utah Office of the Medical Examiner, performed an autopsy on Jill Robinson. Dr. Michalicek preliminarily determined Ms. Robinson's cause of death to be a single gunshot wound to the head and her manner of death to be homicide.

REQUEST FOR ISSUANCE OF A WARRANT:

The State hereby requests that the Court issue a Warrant of Arrest with no bail allowed in this case due to the nature of the offenses and facts as alleged in the probable cause statement. Additionally, the defendant is currently incarcerated in the Salt Lake County Jail. A Warrant of Arrest is necessary to prevent risk of injury to a person or property, to protect the public safety and welfare of the community or an individual, and to secure the appearance of the accused.

Pursuant to Utah Code Annotated § 78B-5-705 (2008) I declare under criminal penalty of the State of Utah that the foregoing is true and correct to the best of my belief and knowledge.

Executed on: AUGUST 21, 2018



T. Sayes
Declarant

Authorized for presentment and filing
SIM GILL, District Attorney



Deputy District Attorney
21st day of August, 2018
EG / DA Case No. 18018806

OTHER PENDING CASES FOR THE DEFENDANT

<u>Court</u>	<u>Court Case #</u>	<u>Trial Judge</u>	<u>DAO#</u>	<u>Charge</u>
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**IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT
IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH**

THE STATE OF UTAH,
Plaintiff,

vs.

KEVIN WAYNE BILLINGS,
DOB: 12/14/1953
4102 WEST WENDY AVENUE
WEST VALLEY CITY, UT 84120
Booking# 18040500
Defendant.

WARRANT OF ARREST

Case No.

DA Case No. 18018806

THE STATE OF UTAH;

To any Peace Officer in the State of Utah, Greetings:

An Information, based upon a written declaration having been declared by Detective T. Sayes with the Salt Lake City Police Department in reference to agency case no. 18-144338, has been filed and it appears from the Information or Declaration filed with the Information, that there is probable cause to believe the public offenses of:

CRIMINAL HOMICIDE, AGGRAVATED MURDER, First Degree Felony; AGGRAVATED ARSON, First Degree Felony; ARSON, Second Degree Felony; ABUSE OR DESECRATION OF A HUMAN BODY, Third Degree Felony; five counts of POSSESSION OF EXPLOSIVE PARTS, all Third Degree Felonies; and four counts of AGGRAVATED CRUELTY TO AN ANIMAL, all Class A Misdemeanors; have been committed, and that KEVIN WAYNE BILLINGS has committed them.

FURTHER, the Court finds, based upon information provided in the Declaration of Probable Cause and the State's Request for Issuance of a Warrant, that a warrant is necessary in this case to:

- prevent risk of injury to a person or property; and/or
- secure the appearance of the accused; and/or
- protect the public safety and welfare of the community or an individual.

YOU ARE THEREFORE COMMANDED to arrest the above-named defendant forthwith and bring the defendant before this Court, or before the nearest or most accessible magistrate for setting bail. If the defendant has fled justice, you shall pursue the defendant into any other county of this state and there arrest the defendant. The Court finds reasonable grounds to believe defendant will not appear upon a summons.

BAIL NOT ALLOWED.

This Warrant may be served day or night.