

SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
MATTHEW B. JANZEN, Bar No. 8219
ALICIA H. COOK, Bar No. 8851
Deputy District Attorney
111 East Broadway, Suite #400
Salt Lake City, UT 84111
Telephone: (801)363-7900

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

<p>THE STATE OF UTAH Plaintiff, vs. HELAMA JOSE BAR PRAGANA DOB: 02/04/1989, AKA: HELAMAN PRAGANA,H PRAGANA,HELANAN PRAGANA,H PRAGANA 4340 West 5295 S. Kearns, UT 84118 D.L.# 177094089 OTN 37279791 SO# 312084 Defendant.</p>	<p>Screened by: MATTHEW B. JANZEN Assigned to: <u>MATTHEW B. JANZEN &</u> <u>ALICIA COOK</u> DAO # 11023840 ECR Status: NON-ECR Initial Appearance: Bail: \$1,000,007 Warrant/Release: WARRANT INFORMATION Case No.</p>
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The undersigned J. Huggard – TAYLORSVILLE POLICE, Agency Case No. 11-86811, upon a written affidavit states on information and belief that the defendant, HELAMA JOSE BAR PRAGANA, committed the crime of:

COUNT 1

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about April 02, 2011 at 5219 SOUTH 4015 WEST, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against N.D. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 2

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about April 08, 2011 at 5219 SOUTH 4015 WEST, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against C.G. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 3

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about April 22, 2011 at 5416 SOUTH REDWOOD ROAD, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against S.C. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 4

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about April 23, 2011 at 3646 WEST 4700 SOUTH, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against T.J. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 5

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about April 23, 2011 at 3646 WEST 4700 SOUTH, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against A.C.R. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 6

AGGRAVATED BURGLARY, § 76-6-203 UCA, first degree felony, as follows: That on or about April 23, 2011 at 3646 WEST 4700 SOUTH, in Salt Lake County, State of Utah the defendant did attempt, commit, or flee from a burglary and while doing so the defendant, or another participant in the crime,

(a) caused bodily injury to any person who was not a participant in the crime;

(b) used or threatened the immediate use of a dangerous weapon against any person who was not a participant in the crime; or

(c) possessed or attempted to use any explosive or dangerous weapon.

COUNT 7

CRIMINAL MISCHIEF, § 76-6-106(2)(c) UCA, class B misdemeanor, as follows: That on or about April 23, 2011 at 3646 WEST 4700 SOUTH, in Salt Lake County, State of Utah the defendant did intentionally damage, deface, or destroy the property of another and the actor's conduct caused or was intended to cause pecuniary loss less than \$500 in value.

COUNT 8

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about May 08, 2011 at 3646 WEST 4700 SOUTH, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against T.J. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 9

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about May 08, 2011 at 3646 WEST 4700 SOUTH, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against A.C.R. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 10

AGGRAVATED BURGLARY, § 76-6-203 UCA, first degree felony, as follows: That on or about May 08, 2011 at 3646 WEST 4700 SOUTH, in Salt Lake County, State of Utah the defendant did attempt, commit, or flee from a burglary and while doing so the defendant, or another participant in the crime,

(a) caused bodily injury to any person who was not a participant in the crime;

(b) used or threatened the immediate use of a dangerous weapon against any person who was not a participant in the crime; or

(c) possessed or attempted to use any explosive or dangerous weapon.

COUNT 11

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about May 15, 2011 at 5219 SOUTH 4015 WEST, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against T.K. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 12

AGGRAVATED KIDNAPPING, § 76-5-302 UCA, first degree felony, as follows: That on or about May 15, 2011 at 5219 SOUTH 4015 WEST, in Salt Lake County, State of Utah the defendant did, in the course of committing unlawful detention or kidnapping of T.K.,

(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 13

AGGRAVATED ROBBERY, §76-6-302 UCA, first degree felony, as follows: That on or about May 15, 2011 at 5219 SOUTH 4015 WEST, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against T.O. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 14

AGGRAVATED KIDNAPPING, §76-5-302 UCA, first degree felony, as follows: That on or about May 15, 2011 at 5219 SOUTH 4015 WEST, in Salt Lake County, State of Utah the defendant did, in the course of committing unlawful detention or kidnapping of T.O.,

(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 15

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about May 15, 2011 at 5219 SOUTH 4015 WEST, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against K.M. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or
(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and
(2) in the course of committing the before mentioned act,
(a) used or threatened to use a dangerous weapon;
(b) caused serious bodily injury upon another; or
(c) took or attempted to take an operable motor vehicle.

COUNT 16

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about May 26, 2011 at 5564 SOUTH REDWOOD ROAD, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against C.J. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or
(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and
(2) in the course of committing the before mentioned act,
(a) used or threatened to use a dangerous weapon;
(b) caused serious bodily injury upon another; or
(c) took or attempted to take an operable motor vehicle.

COUNT 17

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about May 26, 2011 at 5564 SOUTH REDWOOD ROAD, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against M.R. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or
(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and
(2) in the course of committing the before mentioned act,
(a) used or threatened to use a dangerous weapon;
(b) caused serious bodily injury upon another; or
(c) took or attempted to take an operable motor vehicle.

COUNT 18

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about May 26, 2011 at 5564 SOUTH REDWOOD ROAD, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against J.H. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or
(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and
(2) in the course of committing the before mentioned act,
(a) used or threatened to use a dangerous weapon;
(b) caused serious bodily injury upon another; or
(c) took or attempted to take an operable motor vehicle.

COUNT 19

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about May 26, 2011 at 5564 SOUTH REDWOOD ROAD, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against L.L. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or
(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and
(2) in the course of committing the before mentioned act,
(a) used or threatened to use a dangerous weapon;
(b) caused serious bodily injury upon another; or
(c) took or attempted to take an operable motor vehicle.

COUNT 20

AGGRAVATED KIDNAPPING, § 76-5-302 UCA, first degree felony, as follows: That on or about May 26, 2011 at 5564 SOUTH REDWOOD ROAD, in Salt Lake County, State of Utah the defendant did, in the course of committing unlawful detention or kidnapping of M.R.,

(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 21

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about June 10, 2011 at 4693 SUNSTONE ROAD, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against P.J. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 22

AGGRAVATED KIDNAPPING, § 76-5-302 UCA, first degree felony, as follows: That on or about June 10, 2011 at 4693 SUNSTONE ROAD, in Salt Lake County, State of Utah the defendant did, in the course of committing unlawful detention or kidnapping of P.J.,

(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 23

AGGRAVATED SEXUAL ASSAULT, § 76-5-405 UCA, first degree felony, as follows: That on or about June 10, 2011 at Jordan River Parkway, in Salt Lake County, State of Utah the defendant did, (a) in the course of a rape, object rape, forcible sodomy, or forcible sexual abuse, (i) use, or threaten P.J. with the use of, a dangerous weapon as defined in Utah Code Section 76-1-601;
(ii) compel, or attempt to compel, the victim to submit to rape, object rape, forcible sodomy, or forcible sexual abuse, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
(iii) receive aid or abetment from one or more persons;
(b) in the course of an attempted rape, attempted object rape, or attempted forcible sodomy, (i) cause serious bodily injury to any person;
(ii) use, or threaten the victim with the use of, a dangerous weapon as defined in Section 76-1-601;
(iii) attempt to compel the victim to submit to rape, object rape, or forcible sodomy, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
(iv) receive aid or abetment from one or more persons; or
(c) in the course of an attempted forcible sexual abuse:
(i) cause serious bodily injury to any person;
(ii) use, or threaten the victim with the use of, a dangerous weapon as defined in Section 76-1-601;
(iii) attempt to compel the victim to submit to forcible sexual abuse, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
(iv) receive aid or abetment from one or more persons.

COUNT 24

FORCIBLE SODOMY, § 76-5-403(2) UCA, first degree felony, as follows: That on or about June 10, 2011 at Jordan River Parkway, in Salt Lake County, State of Utah the defendant did engage in any sexual act with a person 14 years of age or older, and without P.J.'s consent, involving the genitals of one person and the mouth or anus of another person, regardless of the sex of either participant.

COUNT 25

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about June 24, 2011 at 5707 South Hillwood Way, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against L.G. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

- (b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and
- (2) in the course of committing the before mentioned act,
 - (a) used or threatened to use a dangerous weapon;
 - (b) caused serious bodily injury upon another; or
 - (c) took or attempted to take an operable motor vehicle.

COUNT 26

AGGRAVATED BURGLARY, § 76-6-203 UCA, first degree felony, as follows: That on or about June 24, 2011 at 5707 SOUTH HILLWOOD WAY, in Salt Lake County, State of Utah the defendant did attempt, commit, or flee from a burglary and while doing so the defendant, or another participant in the crime,

- (a) caused bodily injury to any person who was not a participant in the crime;
- (b) used or threatened the immediate use of a dangerous weapon against any person who was not a participant in the crime; or
- (c) possessed or attempted to use any explosive or dangerous weapon.

COUNT 27

SEXUAL BATTERY, § 76-9-702 (3) UCA, class A misdemeanor, as follows: That on or about June 24, 2011 at 5707 SOUTH HILLWOOD WAY, in Salt Lake County, State of Utah the defendant did, under circumstances not amounting to rape, rape of a child, object rape, object rape of a child, forcible sodomy, sodomy upon a child, forcible sexual abuse, sexual abuse of a child, aggravated sexual abuse of a child, aggravated sexual assault, or an attempt to commit any of these offenses, intentionally touch, whether or not through clothing, the anus, buttocks, or any part of the genitals of another person, or the breast of a female, and the defendant's conduct was under circumstances the defendant knew or should have known would likely cause affront or alarm to the person touched.

COUNT 28

ATTEMPTED AGGRAVATED ROBBERY, § 76-6-302 UCA, second degree felony, as follows: That on or about June 24, 2011 at Summerwood Apartments, in Salt Lake County, State of Utah the defendant did attempt to

- (a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against S.T. will, by means of force or fear; or
- (b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft; and in the course of committing said robbery
 - (a) use or threaten to use a dangerous weapon;
 - (b) cause serious bodily injury upon another; or
 - (c) take an operable motor vehicle.

COUNT 29

ATTEMPTED AGGRAVATED KIDNAPPING, § 76-5-302 UCA, second degree felony, as follows: That on or about June 24, 2011 at Summerwood Apartments, in Salt Lake County, State of Utah the defendant did, in the course of committing unlawful detention or kidnapping of S.T.:

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

(b) acted with intent:

(i) to attempt 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 attempt to facilitate the commission, attempted commission, or flight after commission or attempted commission of a felony;

(iii) to attempt to hinder or delay the discovery of or reporting of a felony;

(iv) to attempt to inflict bodily injury on or to terrorize the victim or another;

(v) to attempt to interfere with the performance of any governmental or political function; or

(vi) to attempt to commit a sexual offense as described in Title 76, Chapter 5, Part 4 of the Utah Code (Sexual Offenses).

COUNT 30

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about June 30, 2011 at Summerwood Apartments, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against M.L. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

(b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

(a) used or threatened to use a dangerous weapon;

(b) caused serious bodily injury upon another; or

(c) took or attempted to take an operable motor vehicle.

COUNT 31

AGGRAVATED KIDNAPPING, § 76-5-302 UCA, first degree felony, as follows: That on or about June 30, 2011 at Summerwood Apartments, in Salt Lake County, State of Utah the defendant did, in the course of committing unlawful detention or kidnapping of M.L.,

(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 32

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about July 03, 2011 at Summerwood Apartments, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against A.B. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

- (b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

- (a) used or threatened to use a dangerous weapon;
- (b) caused serious bodily injury upon another; or
- (c) took or attempted to take an operable motor vehicle.

COUNT 33

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about August 17, 2011 at 845 East 4500 South, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against J.D. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

- (b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and

(2) in the course of committing the before mentioned act,

- (a) used or threatened to use a dangerous weapon;
- (b) caused serious bodily injury upon another; or
- (c) took or attempted to take an operable motor vehicle.

COUNT 34

AGGRAVATED ROBBERY, § 76-6-302 UCA, first degree felony, as follows: That on or about August 17, 2011 at 845 East 4500 South, in Salt Lake County, State of Utah the defendant did (1)(a) unlawfully and intentionally take or attempt to take personal property in the possession of another from his or her person, or immediate presence, against A.C. will, by means of force or fear, and with a purpose or intent to deprive the person permanently or temporarily of the personal property; or

- (b) intentionally or knowingly use force or fear of immediate force against another in the course of committing a theft or wrongful appropriation; and in the course of committing said robbery; and
- (2) in the course of committing the before mentioned act,
 - (a) used or threatened to use a dangerous weapon;
 - (b) caused serious bodily injury upon another; or
 - (c) took or attempted to take an operable motor vehicle.

COUNT 35

AGGRAVATED KIDNAPPING, § 76-5-302 UCA, first degree felony, as follows: That on or about August 17, 2011 at 845 East 4500 South, in Salt Lake County, State of Utah the defendant did, in the course of committing unlawful detention or kidnapping of A.C.,

- (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 36

AGGRAVATED SEXUAL ASSAULT, § 76-5-405 UCA, first degree felony, as follows: That on or about August 17, 2011 at 845 East 4500 South, in Salt Lake County, State of Utah the defendant did, (a) in the course of a rape, object rape, forcible sodomy, or forcible sexual abuse,

- (i) use, or threaten A.C. with the use of, a dangerous weapon as defined in Utah Code Section 76-1-601;
- (ii) compel, or attempt to compel, the victim to submit to rape, object rape, forcible sodomy, or forcible sexual abuse, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
- (iii) receive aid or abetment from one or more persons;
- (b) in the course of an attempted rape, attempted object rape, or attempted forcible sodomy,
 - (i) cause serious bodily injury to any person;
 - (ii) use, or threaten the victim with the use of, a dangerous weapon as defined in Section 76-1-601;
 - (iii) attempt to compel the victim to submit to rape, object rape, or forcible sodomy, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
 - (iv) receive aid or abetment from one or more persons; or
- (c) in the course of an attempted forcible sexual abuse:
 - (i) cause serious bodily injury to any person;

- (ii) use, or threaten the victim with the use of, a dangerous weapon as defined in Section 76-1-601;
- (iii) attempt to compel the victim to submit to forcible sexual abuse, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
- (iv) receive aid or abetment from one or more persons.

COUNT 37

AGGRAVATED SEXUAL ASSAULT, § 76-5-405 UCA, first degree felony, as follows: That on or about August 17, 2011 at 845 East 4500 South, in Salt Lake County, State of Utah the defendant did, (a) in the course of a rape, object rape, forcible sodomy, or forcible sexual abuse,

- (i) use, or threaten the victim with the use of, a dangerous weapon as defined in Utah Code Section 76-1-601;
- (ii) compel, or attempt to compel, the victim to submit to rape, object rape, forcible sodomy, or forcible sexual abuse, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
- (iii) receive aid or abetment from one or more persons;
- (b) in the course of an attempted rape, attempted object rape, or attempted forcible sodomy,
 - (i) cause serious bodily injury to any person;
 - (ii) use, or threaten the victim with the use of, a dangerous weapon as defined in Section 76-1-601;
 - (iii) attempt to compel the victim to submit to rape, object rape, or forcible sodomy, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
 - (iv) receive aid or abetment from one or more persons; or
- (c) in the course of an attempted forcible sexual abuse:
 - (i) cause serious bodily injury to any person;
 - (ii) use, or threaten the victim with the use of, a dangerous weapon as defined in Section 76-1-601;
 - (iii) attempt to compel the victim to submit to forcible sexual abuse, by threat of kidnapping, death, or serious bodily injury to be inflicted imminently on any person; or
 - (iv) receive aid or abetment from one or more persons.

COUNT 38

INTERFERENCE WITH ARRESTING OFFICER, § 76-8-305 UCA, class B misdemeanor, as follows: That on or about November 01, 2011 at 500 WEST 200 NORTH, in Salt Lake County, State of Utah the defendant did have knowledge, or by the exercise of reasonable care should have knowledge, that a peace officer was seeking to effect a lawful arrest or detention of the defendant or another and interfered with the arrest or detention by:

- (1) the use of force or any weapon;
- (2) the arrested person's refusal to perform any act required by lawful order:
 - (a) necessary to effect the arrest or detention; and
 - (b) made by a peace officer involved in the arrest or detention; or
- (3) the arrested person's or another person's refusal to refrain from performing any act that would impede the arrest or detention.

COUNT 39

OBSTRUCTING JUSTICE, § 76-8-306(1) UCA, second degree felony, as follows: That on or about August 17, 2011 through November 1, 2011 in Salt Lake County, State of Utah the defendant did, with intent to hinder, delay, or prevent the investigation, apprehension, prosecution, conviction, or punishment of any person regarding conduct that constituted a criminal offense,

- (1)(a) provide any person with a weapon;
 - (b) prevent by force, intimidation, or deception, any person from performing any act that might aid in the discovery, apprehension, prosecution, conviction, or punishment of any person;
 - (c) alter, destroy, conceal, or remove any item or other thing;
 - (d) make, present, or use any item or thing known by the actor to be false;
 - (e) harbor or conceal a person;
 - (f) provide a person with transportation, disguise, or other means of avoiding discovery or apprehension;
 - (g) warn any person of impending discovery or apprehension;
 - (h) warn any person of an order authorizing the interception of wire communications or of a pending application for an order authorizing the interception of wire communications;
 - (i) conceal information that was not privileged and that concerned the offense, after a judge or magistrate had ordered the actor to provide the information; or
 - (j) provide false information regarding a suspect, a witness, the conduct constituting an offense, or any other material aspect of the investigation; and
- (2) the conduct which constituted a criminal offense would be a capital felony or first degree felony.

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

A.B., B.B., J.C., S.C., A.C., T.C., B.C, T.C., A.C., N.D., T DURAN, Jordan Duford, JAKE ELSASSER, SHAWN FAUSETT, A FOX, CARMEN GARCIA, L.G., DAVID GRECO, J.H., J HORNER, Jason Huggard, MIKE IKEMIYASHIRO, T.J., ADAM JETER, C.J., K.J., P.J., T.K., M.L., L.L., M MADSEN, K.M., S.M., C MILLS, H.N., T.O., , Isaac Pace, M.R., A.R.C., JEFF SANDERSON, S.T., MIKE VALDES, M.V.,

AFFIDAVIT OF PROBABLE CAUSE:

The reports and investigation of Taylorsville Police, Unified Police, and West Valley Police revealed the following:

1. N.D. states that on the night of April 2, 2011, she was at the America First Credit Union (AFCU) ATM located at 5219 South 4015 West, Salt Lake County. N.D. states that she withdrew \$80. Ms. Davis states that a male wearing black clothing, cloth covering his face, gloves, and carrying a hand gun approached her vehicle. The male pointed the gun at her and said, "Give me the money." N.D. shoved the money into the male's hand and sped away as the male attempted to open her door.
2. C.G. states that on the night of April 8, 2011, she was in her vehicle at the AFCU located at 5219 South 4015 West, Salt Lake County. C.G. states that she was withdrawing money from the ATM when she observed a male, wearing a black sweatshirt, black pants and carrying a handgun, approached her vehicle from behind. C.G. states that she screamed and drove away leaving her ATM card in the machine. C.G. states that \$300 was withdrawn from her account on the night of April 8, 2011 without her permission.
3. S.C. states that on April 22, 2011, he was working at the Shell gas station located at 5416 South Redwood Road, Salt Lake County. S.C. states that a male wearing a black sweatshirt, black pants, and wearing a black face mask entered the gas station. S.C. states that the male approached him and pointed a handgun at him and said, "Give me the money from the till." S.C. gave the male all the money, totaling \$117, and the male left.
4. T.J. and A.C.R. were working at the Dollar Tree located at 3646 West 4700 South, Salt Lake County on the night of April 23, 2011. T.J. and A.C.R. were closing out their tills at the end of the night when a male wearing black clothing with his face covered approached the front glass door. The male had a handgun and began to bang it against the door. The male threw a planter pot through the glass door and entered the store. The male left with approximately \$2,500.
5. T.J. and A.C.R. were working at the Dollar Tree located at 3646 West 4700 South, Salt Lake County on the night of May 8, 2011. T.J. and A.C.R. were getting ready to lock the doors and leave when the observed a male wearing black pants and a black sweatshirt. T.J. and A.C.R. ran back into the store and hid. Video surveillance shows the male walk near the registers, look around, and walk out. T.J. and A.C.R. state that the male that entered the store on May 8th matched the description of the male that robbed the store on April 23, 2011.
6. T.K. states that on the night of May 15, 2011, he went to AFCU ATM located at 5219 South 4015 West, Salt Lake County. T.K. states that a male wearing black clothing, black cloth covering his face, and carrying a handgun entered his vehicle. T.K. states that the male ordered him to withdraw money. T.K. states that when he was unable to complete the transaction the male forced him to drive to another credit union located near 4100 South 4800 West. The male then told T.K. to take him back to the AFCU location. T.K. states that the male told him he would kill him if he called police.
7. T.O. states that on the night of May 15, 2011, she went to the AFCU ATM located at 5219 South 4015 West, Salt Lake County. T.O. states that a male wearing all black with a black mask approached her vehicle. T.O. states the male had a handgun and entered her

vehicle. T.O. states that the male ordered her to withdraw \$100, which she did and gave to the male. T.O. states that the male ordered her to drive around the building. T.O. states that they pulled back into the ATM behind another vehicle. T.O. states that the male demanded her cell phone and car keys. T.O. observed as the male robbed the vehicle in front of her. The male returned her cell phone and car keys and ordered her to leave.

8. K.M. states that on the night of May 15, 2011, she went to the AFCU ATM located at 5219 South 4015 West, Salt Lake County. K.M. states that a male wearing black and a black mask exited the vehicle behind her and approached her vehicle with a handgun. K.M. states that the male took her ATM card and withdrew \$300.
9. C.J., M.R., J.H., and L.L, were working at the Dollar Tree located at 5546 South Redwood Road, Salt Lake County on the night of May 26, 2011. A male wearing black clothing with his face covered enter the store with a handgun. J.H. states that the male ordered her to put the money from the cash registers in a plastic bag. The male led all employees to the office at gun point and gathered additional money from the office. The male then took M.R. with him to the back door where he left.
10. P.J. states that she was getting out of her vehicle at 4693 South Sunstone Road, Salt Lake County, in the early morning hours of June 10, 2011. A male wearing black clothing, gloves, and a mask to cover his face ordered her into her vehicle at gunpoint. The male ordered her to drive to an AFCU ATM near 5400 South 2700 West, Salt Lake County. P.J. attempted to withdraw \$300 but the transaction was denied. The male ordered her to drive back to the Sunstone Road address and then ordered her to enter the Jordan River Park with him at gunpoint. The male threatened to kill J.P. several times. J.P. states that the male then fondled her breasts with gloved hands. J.P. states that the male then forced her to give him oral sex. The male then pulled down J.P.'s pants and attempted several times to insert his penis into her anus. The male then took P.J. back to the apartment and fondled her breasts and left. P.J. submitted to a sexual assault exam where physical evidence was collected.
11. L.G. states that on the night of June 24, 2011, she was at Summerwood Apartments in Salt Lake County. L.G. states she was unlocking her apartment door when a male wearing black clothing approached her from behind. The male forced his way into the apartment. L.G. states that the male was wearing gloves and holding a handgun. L.G. states that the male wanted her to go to an ATM and withdraw money, she refused. L.G. states that the male pointed the gun at her and told her to take off her shirt and "show me your boobs." The male then forced L.G. to take off her bra and pants. The male then demanded L.G. give him all her money. The male left the apartment with \$50.
12. S.T. states that on the night of June 24, 2011, she was at the Summerwood Apartment located in Salt Lake County. S.T. states that a male wearing black clothing, gloves, with his face covered approached her with a handgun. The male demanded she go with him. S.T. told the male that she had cash and credit cards in her purse inside her apartment. S.T. states that the male began to ask about the money and followed her. As S.T. approached her door she ran into her apartment and locked the door and called police.
13. M.L. sates that on the night of June 30, 2011, she was at the Summerwood Apartments in Salt Lake County. M.L. states she was parking her vehicle when a male opened her door, pointed a handgun at her, and demanded money. M.L. states that the male got in her

vehicle and ordered her to drive to a Key Bank ATM near 5550 South Redwood Road, Salt Lake County. M.L. states that the male ordered her to type in her PIN number but she did not have any money in her account. The male then ordered her to drive back to the Summerwood Apartments where he told her not to report this to police because he knows where she lives.

14. A.B. states that on the night of July 3, 2011, she was at the Summerwood Apartments in Salt Lake County. A.B. states that a male wearing a black sweatshirt and black pants approached her from behind. A.B. states that the male's face was covered. A.B. states that she dropped to her knees and started to scream. A.B. states that the male grabbed her as she went to the ground. A.B. states that the male grabbed her purse and ran away.
15. J.D. states that on the night of August 17, 2011, he was working as a gas attendant cashier at Smith's located at 845 East 4500 South, Salt Lake County. J.D. states that he was approached by a male wearing a black sweatshirt and black mask. J.D. states that the male was carrying a handgun and demanded he get money from the store.
16. A.C. states that on the night of August 17, 2011, she went to get gas at the Smith's located at 845 East 4500 South, Salt Lake County. A.C. states that a male wearing a black sweatshirt and black mask approached her at gunpoint. A.C. states that the male got into the car and told her to drive to an ATM. A.C. states that she went to an AFCU and withdrew money and gave it to the male. A.C. states that the male had her pull over to the side of the road and forced her to give him oral sex in the front seat of her vehicle. The male then forced A.C. to the back seat with him and he grabbed her breasts. A.C. states that male had her wet his penis with her mouth and then he placed his penis inside her vagina. A.C. states that defendant then forced her to put her mouth on his penis and he ejaculated. A.C. states that the defendant ordered her back near the Smith's and he exited the vehicle. A.C. submitted to a sexual assault exam where physical evidence was collected.
17. Detective I. Pace with Unified Police Department states that he met with Detective J. Huggard with Taylorsville Police and they took the physical evidence collected from the sexual assault cases to the Utah State Crime laboratory.
18. In October 2011, through further investigation, Detective Pace received information concerning defendant HELAMA JOSE BAR PRAGANA. Detective Pace obtained a search warrant to get a DNA sample from PRAGANA.
19. On November 1, 2011, detectives from Taylorsville Police and Unified Police responded to PRAGANA's place of employment in North Salt Lake to serve a search warrant. Detectives identified themselves as police officers to PRAGANA. Detectives asked PRAGANA to stand to be handcuffed at which point PRAGANA resisted by pulling his arms away and ran away from detectives.
20. Rebekah Kay, Senior Forensic Scientist, with the State of Utah Crime Laboratory that she analyzed the physical evidence collected from A.C. and P.J. Ms. Kay was able to identify a DNA match between the two cases. Ms. Kay obtained a DNA profile of the buccal swab from PRAGANA. The DNA profile developed from PRAGANA's buccal swab matched the DNA from A.C.'s case.

21. The post-*Miranda* statement of the defendant, PRAGANA, that he lives in a home located at 4340 West 5295 South, Salt Lake County. PRAGANA states that he committed more than one robbery at AFCU. PRAGANA states that he would approach the vehicles at the ATM from the behind and that he didn't have to "hide" because it was dark. The defendant admits that one night he got into a vehicle with a male and told him "give me all your money." PRAGANA states that he wore black pants, a black sweatshirt with a hood and gloves. PRAGANA states that he wore a t-shirt to cover his face. PRAGANA admits that he also took a gun to the ATM robberies. PRAGANA states that he stopped going to the ATM because of the "risk." PRAGANA admits to robbing a gas station on "redwood" wearing black clothing carrying a gun. PRAGANA admits that he robbed a Dollar Tree store by breaking a window, and went back to the same Dollar Tree another night. PRAGANA admits to going to the Summerwood Apartments and making a "Spanish lady" drive him to an ATM, but she didn't have any money. PRAGANA states that he approached a young woman at Summerwood Apartments and grabbed her purse and ran. PRAGANA states that he was wearing black clothing and carrying a gun during the Summerwood incidents. PRAGANA admits that while at the Smith's he observed A.C. standing at the gas pumps. PRAGANA states that he got into A.C.'s vehicle and went to her ATM where he obtained \$500. PRAGANA admits that he made A.C. give him oral sex. PRAGANA admits that he later saw himself on video that was aired by local media. PRAGANA indicates that he threw away his sweatshirt, gloves and mask. PRAGANA further states that he took apart his handgun and threw the parts in a river.

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: _____

Jason Huggard
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

Deputy District Attorney
8th day of November, 2011
KH / DAO # 11023840

AGGRAVATED BURGLARY, first degree felony, OBSTRUCTING JUSTICE, second degree felony, AGGRAVATED SEXUAL ASSAULT, first degree felony, has been committed, and that HELAMA JOSE BAR PRAGANA has committed them.

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 is set in the amount of \$1,000,007.

Dated this _____ day of November A.D. 2011.

This Warrant may be served day or night.

MAGISTRATE

SERVED: DATE: _____ BY: _____

STATE vs HELAMA JOSE BAR PRAGANA
DAO # 11023840
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OTHER PENDING CASES FOR DEFENDANT

<u>Court</u>	<u>Court Case #</u>	<u>Trial Judge</u>	<u>DAO #</u>	<u>Charge</u>
		NONE		