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

<p>THE STATE OF UTAH</p> <p>Plaintiff,</p> <p>vs.</p> <p>VALENTIN DULLA SANTARROMANA DOB: 01/20/1978, AKA: VAL SANTARROMANA 3313 SOUTH SCOTT COURT MILLCREEK, UT 84106 D.L.# 191744044 OTN 48946065 SO# 397518 Booking# 15047463</p> <p>Defendant.</p>	<p>Screened by: BLAKE HILLS, CORAL SANCHEZ-ROSE & ANDREW K. DEESING Assigned to: BLAKE HILLS, CORAL SANCHEZ-ROSE & ANDREW K. DEESING</p> <p>DOMESTIC VIOLENCE INFORMATION</p> <p>DAO # 15021109</p> <p>\$1,000,000. *CASH ONLY*</p> <p>Warrant/Release: IN JAIL</p> <p>Case No.</p>
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The undersigned R. Ransdell - UNIFIED POLICE DEPARTMENT, Agency Case No. 15-142655, upon a written declaration states on information and belief that the defendant, VALENTIN DULLA SANTARROMANA, committed the crimes of:

COUNT 1

ATTEMPTED CRIMINAL HOMICIDE, AGGRAVATED MURDER (DV) (DANGEROUS WEAPON), 76-5-202 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did intentionally or knowingly attempt to cause the death of another under any of the following circumstances:

- (b) the attempted homicide was committed incident to one act, scheme, course of conduct, or criminal episode during which the actor attempted to kill one or more persons in addition to the victim whom the actor attempted to kill; or
- (c) the actor knowingly created a great risk of death to a person other than the victim and the actor; or

(d) the attempted homicide was committed incident to an act, scheme, course of conduct, or criminal episode during which the actor committed or attempted to commit forcible sodomy, forcible sexual abuse, aggravated sexual assault, aggravated kidnapping, or kidnapping. Furthermore the defendant was a cohabitant of the victim.

Further, a dangerous weapon or a facsimile of a dangerous weapon or the representation of a dangerous weapon was used in the commission or furtherance of the crime, giving rise to enhanced penalties as provide §76-3-203.8, Utah Code Annotated, 1953 as amended.

COUNT 2

ATTEMPTED CRIMINAL HOMICIDE, AGGRAVATED MURDER (DANGEROUS WEAPON), 76-5-202 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did intentionally or knowingly attempt to cause the death of another under any of the following circumstances:

(b) the attempted homicide was committed incident to one act, scheme, course of conduct, or criminal episode during which the actor attempted to kill one or more persons in addition to the victim whom the actor attempted to kill; or

(c) the actor knowingly created a great risk of death to a person other than the victim and the actor.

Further, a dangerous weapon or a facsimile of a dangerous weapon or the representation of a dangerous weapon was used in the commission or furtherance of the crime, giving rise to enhanced penalties as provide §76-3-203.8, Utah Code Annotated, 1953 as amended.

COUNT 3

AGGRAVATED KIDNAPPING (DV) (DANGEROUS WEAPON), 76-5-302 UCA, First Degree Felony, as follows: That on or about August 22, 2015, 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).

Furthermore, the defendant caused serious bodily injury to another during the course of the commission of the Aggravated Kidnapping, subjecting him to a sentence of life without parole.

Furthermore the defendant was a cohabitant of the victim.

Further, a dangerous weapon or a facsimile of a dangerous weapon or the representation of a dangerous weapon was used in the commission or furtherance of the crime, giving rise to enhanced penalties as provide §76-3-203.8, Utah Code Annotated, 1953 as amended.

COUNT 4

AGGRAVATED SEXUAL ASSAULT (DV) (DANGEROUS WEAPON), 76-5-405 UCA, First Degree Felony, as follows: That on or about August 22, 2015, 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 §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
- (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 § 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
- (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 § 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.

Furthermore the defendant was a cohabitant of the victim.

Further, a dangerous weapon or a facsimile of a dangerous weapon or the representation of a dangerous weapon was used in the commission or furtherance of the crime, giving rise to enhanced penalties as provide §76-3-203.8, Utah Code Annotated, 1953 as amended.

COUNT 5

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY (DV), 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

- (a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
- (b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person. Furthermore the defendant was a cohabitant of the victim.

COUNT 6

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY (DV), 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

- (a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
- (b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person. Furthermore the defendant was a cohabitant of the victim.

COUNT 7

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY (DV), 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person. Furthermore the defendant was a cohabitant of the victim.

COUNT 8

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY (DV), 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person. Furthermore the defendant was a cohabitant of the victim.

COUNT 9

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 10

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 11

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 12

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 13

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 14

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 15

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 16

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1 UCA, First Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 17

ASSAULT AGAINST A PEACE OFFICER OR MILITARY SERVICE MEMBER, 76-5-102.4(4) UCA, Second Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did assault a peace officer, with the knowledge that the person was a peace officer, when the peace officer was acting within the scope of his authority as a peace officer; and used a dangerous weapon as defined in Section 76-1-601.

COUNT 18

ASSAULT AGAINST A PEACE OFFICER OR MILITARY SERVICE MEMBER, 76-5-102.4(4) UCA, Second Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did assault a peace officer, with the knowledge that the person was a peace officer, when the peace officer was acting within the scope of his authority as a peace officer; and used a dangerous weapon as defined in Section 76-1-601.

COUNT 19

ASSAULT AGAINST A PEACE OFFICER OR MILITARY SERVICE MEMBER, 76-5-102.4(4) UCA, Second Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did assault a peace officer, with the knowledge that the person was a peace officer, when the peace officer was acting within the scope of his authority as a peace officer; and used a dangerous weapon as defined in Section 76-1-601.

COUNT 20

AGGRAVATED ASSAULT (DV), 76-5-103(1) UCA, Third Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did commit assault as defined in Utah Code Section 76-5-102 and used a dangerous weapon as defined in Utah Code Section 76-1-601.

Furthermore the defendant was a cohabitant of the victim.

COUNT 21

AGGRAVATED ASSAULT, 76-5-103(1) UCA, Third Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did commit assault as defined in Utah Code Section 76-5-102 and used a dangerous weapon as defined in Utah Code Section 76-1-601.

COUNT 22

AGGRAVATED ASSAULT, 76-5-103(1) UCA, Third Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did commit assault as defined in Utah Code Section 76-5-102 and used a dangerous weapon as defined in Utah Code Section 76-1-601.

COUNT 23

AGGRAVATED ASSAULT, 76-5-103(1) UCA, Third Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did commit assault as defined in Utah Code Section 76-5-102 and used a dangerous weapon as defined in Utah Code Section 76-1-601.

COUNT 24

FELONY DISCHARGE OF A FIREARM, 76-10-508.1 UCA, Third Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,
(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharge a firearm in the direction of any person or habitable structure.

COUNT 25

FELONY DISCHARGE OF A FIREARM, 76-10-508.1 UCA, Third Degree Felony, as follows: That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,
(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharge a firearm in the direction of any person or habitable structure.

COUNT 26

FELONY DISCHARGE OF A FIREARM, 76-10-508.1 UCA, Third Degree Felony, as follows:

That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

- (a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
- (b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

COUNT 27

FELONY DISCHARGE OF A FIREARM, 76-10-508.1 UCA, Third Degree Felony, as follows:

That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

- (a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
- (b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

COUNT 28

FELONY DISCHARGE OF A FIREARM, 76-10-508.1 UCA, Third Degree Felony, as follows:

That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

- (a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
- (b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

COUNT 29

FELONY DISCHARGE OF A FIREARM, 76-10-508.1 UCA, Third Degree Felony, as follows:

That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

- (a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
- (b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

COUNT 30

FELONY DISCHARGE OF A FIREARM, 76-10-508.1 UCA, Third Degree Felony, as follows:

That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

- (a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or
- (b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

COUNT 31

FELONY DISCHARGE OF A FIREARM, 76-10-508.1 UCA, Third Degree Felony, as follows:
That on or about August 22, 2015, in Salt Lake County, State of Utah, the defendant did,

(a) knowing or having reason to believe that any person may be endangered by the discharge of a firearm, discharge a firearm in the direction of any person or persons; or

(b) with the intent to intimidate or harass another, discharge a firearm in the direction of any person.

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

R. RANDELL, J.A., S. BENNETT, H. DRIPPS, J. GULLEY, M. HERBERT, C. HERMANSEN, J.L.H., J.J.H., SERGEANT OEHLER, T. RICHMAN, and OFFICER SHAW.

DECLARATION OF PROBABLE CAUSE:

Your Declarant, Detective R. Ransdell with the Unified Police Department, based on information in report number 2015-142655, interviews of witnesses, and investigation by law enforcement officers states as follows:

On August 22, 2015, at approximately 8:00am J.A. arrived at her residence in Salt Lake County, with her friend J.J.H. Approximately one week prior, J.A. had separated from her husband and father of her children, VALENTIN DULLA SANTARROMANA. Neither party was staying consistently at the residence, and J.A. arrived that morning to provide care for their dogs. J.A. entered the residence while J.J.H. waited outside. Shortly after entering the residence, J.A. was confronted by SANTARROMANA. SANTARROMANA had a gun and a meat cleaver. SANTARROMANA pushed J.A. to the floor and struck her several times in the head with the gun and the flat side of the cleaver. J.A. ran to the front door and screamed to J.J.H. to call 911. SANTARROMANA ran out the front door and shot at J.J.H. fifteen times while she was outside on the phone with the police.

J.J.H. suffered a gunshot wound to her chest which penetrated both lungs and severed her spine; a gunshot wound to her right ear, a gunshot wound to her right scapula, a gunshot wound above her left shoulder, a gunshot wound to her midsection, a gunshot wound to her pelvis, a gunshot wound to her right forearm, a gunshot wound to her left hand, which nearly amputated two fingers; a gunshot wound to her groin, a gunshot wound to her left knee, and a gunshot wound to her left calf.

SANTARROMANA reloaded his gun and struck J.A. with it in the back of her head. J.A. begged SANTARROMANA to stop hitting her and attempted to leave. SANTARROMANA shot J.A. in the ankle as she ran towards the door. SANTARROMANA tore off J.A.'s shirt and forced her to the laundry room in the basement of the residence. SANTARROMANA held the gun to J.A.'s head and forced her to perform oral sex on him. SANTARROMANA tampered with the gas line and repeatedly told J.A. he was going to kill her. After being in the basement for approximately three hours, J.A. heard the police enter the residence and call for her to come out. SANTARROMANA was standing over J.A. as she kneeled with her back to him and her hands over her head. SANTARROMANA shot J.A. several times and shot near the gas line two times. The police then entered and removed J.A. from the house.

J.A. suffered a gunshot wound to the right side of her head, resulting in the loss of her eye; a gunshot wound to her left arm, resulting in a broken bone; two gunshot wounds to her left leg, and one gunshot wound to her right ankle.

Just after 8:00 that morning, J.L.H. was at a nearby business when she heard multiple gunshots and ran outside. J.L.H. observed someone lying in the street. J.L.H. ran to the person while calling 911. J.L.H. reached the person in the street and provided the victim's name and age to the 911 operator. J.L.H. then asked the person who had shot her. The victim answered, "Val." Two male bystanders came over to J.L.H. and the victim. At that time, J.L.H. heard a male call out to them. She turned towards the residence and observed a male standing on the porch, pointing a gun at her and the male bystanders. The male on the porch told them to leave or, "you're next."

SANTARROMANA's neighbor, S.P., stated he received a call from SANTARROMANA shortly after he heard the first rounds of gunfire and the police had arrived. SANTARROMANA instructed S.P. to tell the police that there were grenades by the front door of SANTARROMANA's residence.

The police arrived and made contact with SANTARROMANA. Police attempted to negotiate with SANTARROMANA for several hours; until SANTARROMANA's phone battery began to run out. At approximately 11:00am, the SWAT team approached the side door in an attempt to provide SANTARROMANA with a new phone. The SWAT team was in full gear, clearly identifying them as police officers. An officer used a public announcement system to notify SANTARROMANA that the officers were approaching the side door to deliver the phone. SWAT Medic J. Gulley struck the side door several times with a ram. Officers then heard several bullets hit the same door Medic Gulley was attempting to open. Three bullets pierced the side door and one went through Medic Gulley's protective equipment. Medic Gulley was not injured.

SWAT officers then breached the front door, which was blocked by furniture. Upon entering the home, officers detected a strong odor of natural gas and heard multiple gunshots coming from the basement level. Officers reached the top of the stairs and began a dialog with SANTARROMANA, who stated he shot J.A. in response to the officers entering the house. SANTARROMANA allowed J.A. to leave the basement. SANTARROMANA followed and was taken into custody without further incident.

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: _____

R. Ransdell
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

Deputy District Attorney
10th day of September, 2015
EG / DAO # 15021109

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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