

SIM GILL, Bar No. 6389  
District Attorney for Salt Lake County  
CLINT T HEINER, Bar No. 11905  
Deputy District Attorney  
35 East 500 South  
Salt Lake City, UT 84111  
Telephone: 385-468-7600

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IN THE THIRD DISTRICT COURT, SALT LAKE DEPARTMENT

IN AND FOR THE COUNTY OF SALT LAKE, STATE OF UTAH

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THE STATE OF UTAH

Plaintiff,

vs.

**NICHOLAS EDWARD ROSSI**

**DOB: 07/11/1987**

**AKA: Nicholas Alahverdian, Nicholas  
Brown, Nicholas Arthur Brown Knight,  
Arthur Brown Knight**

**ADDRESS UNKNOWN**

**SID# UNKNOWN**

Defendant.

Screened by: CLINT T HEINER  
Assigned to:

**INFORMATION**

DAO # 22001681

NO BAIL

Warrant/Release: NON JAIL

Case No.

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The undersigned Derek Coats - Utah State Bureau Of Investigations, Agency Case No. 232200066, upon a written declaration states on information and belief that the defendant, NICHOLAS EDWARD ROSSI, committed the crime(s) of:

COUNT 1

RAPE, 76-5-402 UCA, a First Degree Felony, as follows: That on or about November 01, 2008 through December 31, 2008, in Salt Lake County, State of Utah, the defendant did have sexual intercourse with another person without the victim's consent.

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

Derek Coats and M. S.

DECLARATION OF PROBABLE CAUSE:

Your affiant bases probable cause on information and evidence collected by Utah State Bureau of Investigations, Case No. 232200066 and the following:

The statement of M.S. that she met NICHOLAS EDWARD ROSSI online and they dated between November 2008 and December 2008, in Salt Lake County, when she was 26-years old. M.S. stated that ROSSI was "nice," that he seemed smart, university educated, interesting, he liked attention, and would talk to people. M.S. stated that ROSSI was also manipulative, he had no job, and he convinced her to loan him money that he did not repay. ROSSI told M.S. that they should get married shortly after they started dating and they got wedding rings. M.S. stated that ROSSI became emotionally and verbally abusive. Around December 2008, they had gone to the Gateway Mall and ROSSI was rude towards her. M.S. took off the wedding ring and walked to her car. ROSSI followed her. M.S. got into her car and locked the doors. ROSSI stood outside the car screaming at M.S. and hitting the car. Eventually, M.S. let ROSSI in the car, and she drove him to his house in South Salt Lake. ROSSI refused to get out of the car and told M.S. that he would call the cops on her and say that she hit him. When ROSSI calmed down, he asked her to come inside his house. M.S. stated that they went into ROSSI's bedroom, where he shut the door and would not allow her to leave. M.S. stated that they argued about breaking up and not getting married. M.S. stated that during the argument, ROSSI threw her onto the bed and was on top of her. M.S. stated that she was scared that ROSSI was going to hurt her. M.S. stated that ROSSI pulled her pants and underwear down below her knees and he held her wrists above her head with one hand and his other arm was across her, holding her down. ROSSI undid his pants, removed his penis, and forced his penis inside M.S.'s vagina until he ejaculated.

MOTION FOR NO BAIL HOLD:

Pursuant to Utah Code 77-20-201(1) the State requests that Defendant be held without bail until further notice in this matter on the following grounds:

The defendant is charged with a First-Degree felony and based upon the above probable cause statement, there is substantial evidence supporting the charge and clear and convincing evidence that the defendant would constitute a substantial danger to any other individual or to the community or is likely to flee the jurisdiction of the court, if released on bail.

During his investigation, Agent Coats discovered that was the defendant has had numerous contacts with law enforcement that included being accused of theft by an old roommate to being involved in criminal cases of sex assault, harassment and possible kidnapping in Rhode Island, Ohio, Utah, and Massachusetts. In each case, there is a consistent pattern of behavior, where the defendant will meet a female online, he will initially meet with them in public, eventually going somewhere alone with the female, and will initiate some inappropriate contact, leading the female to want to leave. The defendant will either threaten to commit

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suicide or will force a non-consensual sexual encounter. When the defendant is confronted by law enforcement, he says the female is the aggressor in each case.

Agent Coats learned through his investigation, that the defendant faked his own death and was located living in Scotland under a different name. The defendant has multiple aliases. The defendant is now in jail in Scotland. The defendant was fingerprinted in Scotland, which provided his real identity.

The defendant currently has a \$2,500 active warrant for his arrest in the Fourth District Court, case number 221401365 for Sexual Battery.

In this current case, the victim disclosed that she met the defendant online and they began dating. A short time into their relationship, the defendant suggested they get married. During an argument about breaking up and not getting married, the defendant held the victim down and forced his penis into her vagina. The victim disclosed being scared during the incident and stated that she is still scared of the defendant and still fears that he will find her one day. The defendant is a danger to the community and the victim. Due to the defendant's history with law enforcement, and the fact that he faked his own death and fled to Scotland, the defendant should be held without bail.


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

Signed on the 13 day of July 2022  
in Salt Lake County, Utah

  
DEREK COATS  
Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

  
Deputy District Attorney  
13th day of July, 2022  
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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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