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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,	Screened by: HOMICIDE UNIT Assigned to: W. SHANE COHEN BRADFORD D. COOLEY	
vs.	INFORMATION	
HAOYU WANG, DOB: 07/08/1995, 220 S. Connor Rd. Salt Lake City, UT 84111 OTN 61496675 SO# 431260 Booking# 22005377 SID#	NO BAIL REQUESTED Warrant/Release: IN CUSTODY PFR: 02/25/22 Case No.	
Defendant.	DA Case No. 22002616	

The undersigned, Detective J. Robison with Salt Lake City Police Department, in reference to agency case no. 22-25286, upon a written declaration states on information and belief that the defendant, HAOYU WANG, committed the crime of:

## COUNT 1

MURDER, 76-5-203 UCA, First Degree Felony, as follows: That on or about February 11, 2022 at 616 South 200 West, in Salt Lake County, State of Utah, the defendant, intentionally or knowingly caused the death of another; intending to cause serious bodily injury to another, committed an act clearly dangerous to human life that caused the death of another; or acting under circumstances evidencing a depraved indifference to human life, knowingly engaged in conduct which created a grave risk of death to another and thereby caused the death of another.

#### COUNT 2

POSSESSION OF A CONTROLLED SUBSTANCE WITH INTENT TO DISTRIBUTE, 58-37-8(1)(a)(iii) UCA, Second Degree Felony, as follows: That on or about February 11, 2022 at 616

South 200 West, in Salt Lake County, State of Utah, the defendant, knowingly and intentionally possessed, with intent to distribute, a controlled or counterfeit substance that was classified in Schedule I or II; or a controlled substance analog; or gammahydroxybutyric acid as listed in Schedule III.

#### COUNT 3

POSSESSION OF A CONTROLLED SUBSTANCE WITH INTENT TO DISTRIBUTE, 58-37-8(1)(a)(iii) UCA, Third Degree Felony, as follows: That on or about February 11, 2022 at 616 South 200 West, in Salt Lake County, State of Utah, the defendant, knowingly and intentionally possessed, with intent to distribute, marijuana or a controlled or counterfeit substance classified in Schedule III or IV.

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

J. Robison, C. Bowman, R. Chipping, Z. D., K. Jemmett, M. Martinez, B. Palmer, T. Pappas, K. Peterson, J. Winegar, P. Ulmer.

## DECLARATION OF PROBABLE CAUSE:

Your Declarant, Detective J. Robison with the Salt Lake City Police Department, based on information in report number 22-25286, interviews of witnesses, and investigation by law enforcement officers, states as follows:

On February 11, 2022, a staff member at the University of Utah received an email from HAOYU WANG. In the email, WANG stated that he and his girlfriend Z.D. "decided to use opioids to have a painless death. So, I bought heroin and fentanyl on dark net." WANG stated that after they tried some of the drugs, Z.D. suffered respiratory depression and vomiting, then was unconscious for several hours. WANG said that he didn't want to see Z.D. suffer, so he injected her with a high dose of heroin.

Officers with the University of Utah Police Department began a ping on Z.D.'s phone which returned at the Quality Inn located at 616 South 200 West in Salt Lake County. Officers from the Salt Lake City Police Department conducted a welfare check at the Quality Inn. Staff at the motel verified that WANG had checked in on February 3, 2022 and was still a registered guest. Officers forced entry into WANG's room after receiving no response to their knocking. They found WANG lying on the bed next to Z.D. who was deceased. A butterfly syringe was located next to Z.D.

Post-*Miranda*, WANG stated that he and Z.D. had snorted heroin WANG purchased on the internet. WANG fell asleep and did not immediately realize that Z.D. had vomited. WANG eventually saw that Z.D. had vomited and was having difficulty breathing. WANG told officers

that he did not call an ambulance because Z.D. would have been hospitalized and not around to commit suicide. WANG further admitted to officers that Z.D. was unconscious but still breathing for several hours before he chose to inject her hand with more drugs to relieve her suffering and cause her death. WANG then confirmed that Z.D. was dead and stopped breathing. WANG informed the officers that he had purchased illegal drugs via the dark web and had them shipped to the hotel room. WANG injected Z.D. with some of the drugs he received to cause her death.

On February 11, 2021, a DEA Metro Narcotics Task Force Officer tested samples of unknown white powders found in the motel room with a TruNarc handheld narcotics analyzer. The samples tested positive for fentanyl and ketamine. Officers found numerous substances in the room which tested positive for Ketamine and Fentanyl. Unopened packages addressed to WANG were collected and other substances believed to be drugs were sent to the state crime lab for handling and testing. Additional items, including syringes and other drug paraphernalia, were also seized from the scene. Post-*Miranda*, WANG stated that he had purchased heroin, fentanyl and other drugs using bitcoin on the dark web and had the drugs delivered to the hotel room so that he could distribute them to Z.D. to facilitate her death.

On February 12, 2022, Dr. P. Ulmer, Assistant Medical Examiner with the Utah Office of the Medical Examiner, performed an autopsy on Z.D. Dr. Ulmer identified injection marks in Z.D.'s arm and hand, but no trauma or other physical injury that would have caused Z.D.'s death was observed during the autopsy. Dr. Ulmer stated that the autopsy findings will be issued following toxicological testing on Z.D.'s blood samples.

During the investigation it was discovered that on January 12, 2022, WANG was arrested for domestic violence against Z.D. The following day Z.D. called police again due to WANG's behavior.

# REQUEST FOR NO BAIL HOLD:

Pursuant to Utah Code 77-20-1(2), 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 felony and 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, and,

There is substantial evidence supporting the charges in this case. As indicated in the probable cause the Defendant illegally purchased controlled substances via the dark web using bitcoin for the purpose of facilitating someone's death. The Defendant then distributed some of those drugs to the victim, and when she had an adverse reaction, unilaterally decided to take her

life by injecting her with more drugs rather than call an ambulance. Not only did the Defendant admit to doing all of this, but his statements are corroborated by independent evidence observed during the autopsy and a search of the room. A needle mark was found on the victim's hand just as the Defendant indicated. Additionally, initial testing of unknown substances believed to be drugs were positive for fentanyl and ketamine, which is consistent with the Defendant's statements. Officers also located syringes, needles and cups capable of being used for injecting drugs, which also corroborates the Defendant's statements. Additionally, several packages addressed to the Defendant with the mailing address of the hotel were located in the room.

There is clear and convincing evidence that the Defendant would constitute a substantial danger to the community and is likely to flee the jurisdiction if he is released on bail. The Defendant was facing charges for a domestic violence offense against the victim in this case when he chose to take her life by intentionally injecting her with what he believed to be a lethal dose of drugs. He is a native of China and has no formal ties to the community, other than being a new student at the local university. He has demonstrated knowledge of how to use the dark web to engage in criminal activity and by his own admission has access to bitcoin, which he can use to flee the area without the ability of authorities to trace his activities. The increase in criminal activity between January 2022 and February 2022 from assault to murder make him a substantial risk to the safety of others, and his lack of ties to the local community and knowledge and experience with clandestine criminal activities makes him an extremely high risk to flee the jurisdiction.

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 25<sup>th</sup> day of February, 2022, in Salt Lake County, Utah

<u>/s/ J. Robison</u> J. Robison Declarant

Authorized for presentment and filing

SIM GILL, District Attorney

<u>/s/W.S. Cohen</u> Deputy District Attorney 25th day of February, 2022 SG / WSC / DA Case No. # 22002616

# OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO#	Charge