

SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
JOSHUA GRAVES, Bar No. 11393
Deputy District Attorney
35 East 500 South
Salt Lake City, Utah 84111
(385) 468-7600
JGraves@saltlakecounty.gov

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

THE STATE OF UTAH

Plaintiff,

vs.

ALEJANDRO MENDOZA

DOB: 04/05/2007

3412 Adams Ave

Ogden, UT 84404

OTN#:

SO#:

SID#/BCI#:

Booking#:

Defendant.

AGUILAR, ARIANA

DOB: 01/17/1980

AGUILAR, NATALIE ESTELLA

DOB: 02/07/2005

A.M.

DOB: 11/21/2008

J.M.

DOB: 08/08/2009

I.S.

DOB: 10/28/2008

V.V.

DOB: 11/02/2007

Co-Defendant(s)

Screened by: JOSHUA GRAVES
Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 24.018855

BAIL: NO BAIL WARRANT

WARRANT/RELEASE:

Case No.

Co-Defendant DAO# 24.018842

Co-Defendant DAO# 24.018845

Co-Defendant DAO# 24.018847

Co-Defendant DAO# 24.018976

Co-Defendant DAO# 24.018853

Co-Defendant DAO# 24.018850

The undersigned Detective K. BARRETT - Taylorsville City Police Department, Agency Case No. TY24-309111, upon a written declaration states on information and belief that the defendant, ALEJANDRO MENDOZA, committed the crime(s) of:

COUNT 1

MURDER, 76-5-203, a First Degree Felony, as follows: That on or about October 13, 2024 at Salt Lake County, as the party to the offense, the defendant did (a) intentionally or knowingly cause the death of another; intending to cause serious bodily injury to another, commit an act clearly dangerous to human life that caused the death of another; acting under circumstances evidencing a depraved indifference to human life, knowingly engage in conduct which created a grave risk of death to another and thereby caused the death of another; engage in the commission, attempted commission, or immediate flight from the commission or attempted commission of any predicate offense, or was a party to the predicate offense; and a person other than a party as defined in Utah Code Section 76-2-202 was killed in the course of the commission, attempted commission, or immediate flight from the commission or attempted commission of any predicate offense; and the actor acted with the intent required as an element of the predicate offense; to wit: aggravated burglary.

COUNT 2

AGGRAVATED BURGLARY, 76-6-203, a First Degree Felony, as follows: That on or about October 13, 2024 at Salt Lake County, as a party to the offense, 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 as defined in §76-1-101.5.

COUNT 3

OBSTRUCTION OF JUSTICE - CAPITAL/FIRST DEGREE FELONY CONDUCT, 76-8-306(2)+(3A), a Second Degree Felony, as follows: That on or about October 13, 2024 at Salt Lake County, as a party to the offense, the defendant did with intent to hinder, delay, or prevent the investigation, apprehension, prosecution, conviction, or punishment of any person regarding conduct that constitutes an offense that would be a capital felony or first degree felony: alter, destroy, conceal, or remove any item or other thing; provide false information regarding a suspect, a witness, the conduct constituting an offense, or any other material aspect of the investigation; and is a second degree felony if the conduct that constitutes an offense would be a capital felony or first degree felony.

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

DANIELLE O'NEIL, STEVEN JENSEN , THOMAS TEYNOR, ANDREW MCKEON, GARRETT TAN, RYAN CARVER, DANIEL ESPINOZA, NICKLAUS ROGERS, DAVID HOOD, DANIEL CHRISTENSEN, RYE JONES, MICHAEL HAGGARD, Brandon Johnson, COREY LAVIN, SHAWN MCKINNON, JACOB PALMER, STEVEN SYKES, KEVIN BARRETT, BENJAMIN

CAMERON, AARON CHESHIRE, BREANNA DALTON, CASEY HADFIELD, JACOB HILL, ALEX IPSEN, Paulino Rodriguez, Alexandru Apavaloaie, and Rosalba Garcia

DECLARATION OF PROBABLE CAUSE:

Your Declarant bases the Information upon the following:

On or about October 13, 2024, at 3:39 a.m. Taylorsville Police were dispatched to shots fired at a residence in Salt Lake County. Officers arrived and found ARIANA AGUILAR on top of the victim, Jorge Llamas, who was unresponsive. ARIANA stated that Llamas had been shot ten minutes earlier and that she did not know who shot him or where the gun was. ARIANA stated that the shooter got in through the window and shot Llamas. Medical responded and declared Llamas deceased on scene. Officers heard a commotion coming from the front room and exited to find ARIANA holding Rosalba Garcia-Castro on the ground and striking her. Officers ordered ARIANA to stop and took her into custody.

Garcia-Castro stated Llamas and his girlfriend, ARIANA, got into a fight earlier in the evening and that Llamas had locked her out of the apartment. Garcia-Castro stated that later ARIANA returned to the residence with a female she knew as ARIANA's daughter, later identified as NATALIE AGUILAR, and males she did not recognize. Garcia-Castro stated the two males entered Llamas's bedroom and that is when she heard the shot. Garcia-Castro stated she then saw NATALIE and the males run from the residence.

Witness Karla Gabriela Castaneda-Aguilar stated that she was in her bedroom with Alexis Daniel Rodriguez-Cedillos, when they heard Jorge and ARIANA arguing. Karla stated she heard Garcia-Castro yell at ARIANA, "don't hit him, he isn't doing anything to you" and could hear ARIANA hitting Jorge. Karla stated that prior to the shooting she heard ARIANA make a phone call and tell the person to come pick her up. Karla stated she did not hear anyone enter residence, but she heard the shot and ARIANA yelling, "go go go." Karla confirmed that she observed the males and ARIANA's daughter fleeing the residence.

Post-Miranda ARIANA stated that she had been dropped off by a friend after a night of dancing and drinking. ARIANA stated that Llamas was not home, so she waited for him. ARIANA stated that when Llamas returned, they began to argue. ARIANA stated that she left the residence and called her daughter asking for her to come pick her up. ARIANA stated she was walking eastbound when she heard a commotion inside the residence and heard a gunshot. ARIANA stated she did not see anyone enter or exit the residence through the front.

Detectives reviewed security footage and observed a red Chevy Cruze arrive and pull in front of the condo. A minute later three males, later identified as I.S. (10/28/08), A.M-M. (11/21/08), ALEJANDRO MENDEZ, are observed walking towards the vehicle and condo, and then a few minutes after the three males pass two additional males are observed walking in the same direction. Then a few minutes after the three males pass, two additional males, later identified as V.V. (11/02/07) and J.M-R. (08/08/09), are observed walking in the same direction. Detectives conducted a records check on the vehicle and confirmed that the vehicle belonged to ARIANA. Detectives

requested an agency assist from Ogden Police who confirmed that the vehicle was currently at ARIANA's residence in Ogden. Detectives set up surveillance on the residence and observed Nancy Aguilar, V.V., and A.A. (06/08/09) entering the vehicle. Officers conducted a stop on the vehicle and took the occupants into custody without incident. Officers conducted a call out at the residence, ordering all occupants out. A male and NATALIE ESTELLE AGUILAR stepped out of the residence and were taken into custody.

Post-Miranda NATALIE stated that she received a call from her mother, ARIANA, who told her they needed to come jump Llamas. NATALIE confirmed she had driven the car to the residence and that V.V., ALEJANDRO MENDOZA, and J.M.-R. were in the vehicle with her. NATALIE stated that when she arrived, ARIANA was standing by a power box and told everyone that Llamas had "put hands on" her. NATALIE stated that they all went into the residence and woke up Llamas. NATALIE stated that ALEJANDRO and A.M.-M. entered the residence through a window that ARIANA had pried open. ALEJANDRO and A.M.-M. then opened the door for the rest of them to enter. NATALIE stated that they forced their way into Llama's room, then ARIANA was standing over the bed yelling at Llamas. NATALIE stated she stepped out of the room to the front room when she heard a bang that resembled a gunshot. NATALIE stated she knew she should have stayed but she had never been in that situation before and fled the scene with ALEJANDRO. NATALIE stated that ARIANA, V.V. and J.M.-R. were in the room when the gunshot was heard. NATALIE confirmed there were two other juveniles at the residence, but stated she didn't know who they were. NATALIE later admitted she knew who the two juveniles were and identified them as A.M.-M. and I.S.

Detectives asked why NATALIE failed to mention that she knew A.M.-M and I.S. NATALIE stated she didn't want to snitch and feared retaliation. Detectives asked NATALIE who the shooter was to which she responded "it was A.M.-M.". NATALIE stated when she received a call from ARIANA and that she, ALEJANDRO, A.M.-M, V.V., J.M.-R., and I.S. got into the vehicle to drive to the residence. NATALIE stated that upon arriving in the area they located ARIANA who approached the vehicle. NATALIE stated the five males exited the vehicle and she and ARIANA drove and parked in front of the condo. NATALIE stated that ARIANA broke the window screen and opened the window into the front living room and ordered A.M.-M. and ALEJANDRO to go inside and open the door. NATALIE confirmed that A.M.'s gun was visible when they entered the residence. NATALIE stated ARIANA led them to Llamas's room and forced the lock open. NATALIE stated Llamas was asleep when ARIANA told them, "this is the homie." NATALIE stated A.M.-M. began yelling at Llamas, "you are going to lay hands on his homie's mother," and hit him with the gun. NATALIE stated A.M.-M. continued to hit Llamas with the pistol before shooting him.

Post-Miranda V.V. at first stated he had been drinking alcohol all night and had a contact high from secondhand marijuana smoke, so he didn't remember anything. V.V. then stated he recalled that he "snapped" a girl while in the backseat of NATALIE's vehicle but didn't know where they were going. Detectives observed that the clothes V.V. was currently wearing matched the same clothing seen on one of the males from the security footage. V.V. stated he remembered that there were two additional males, identified as A.M.-M. and I.S. , were also with them in the vehicle and residence. V.V.'s parent consented to a search in which Detectives located the shirt V.V. was seen wearing walking towards Llamas's residence.

Detectives responded to ALEJANDRO's and J.M.-R.'s residence to speak with them about the incident. Post-Miranda ALEJANDRO confirmed he, J.M.-R., A.M.-M., V.V., and I.S. were at ARIANA's and NATALIE's residence in Ogden drinking. ALEJANDRO stated that NATALIE told them they needed to get in the vehicle, and they left for Taylorsville. ALEJANDRO stated upon arrival, ARIANA approached the vehicle and told them they needed to scare Llamas for putting his hands on her. ALEJANDRO stated that someone opened a window and one of the boys climbed through to open the locked front door. ALEJANDRO stated NATALIE, ARIANA and A.M.-M. entered Llamas's bedroom. ALEJANDRO stated the next thing he heard was a shot and that he and NATALIE ran out of the residence. ALEJANDRO confirmed that he and NATALIE left the area in the vehicle and a few minutes later he realized his brother, J.M.-R. was not with them. ALEJANDRO stated he called J.M.-R. who told him to come pick him and V.V. up.

Post-Miranda J.M.-R. confirmed that he, ALEJANDRO, V.V., A.M.-M., and I.S. left with NATALIE. J.M.-R. stated that prior to arriving in Taylorsville, NATALIE made a stop at another party in Ogden in which A.M.-M., V.V., and I.S. got out of the vehicle, entered and then exited a few minutes later. J.M.-R. stated the six of them then proceeded to Llamas's residence. J.M.-R. stated that they were met by ARIANA upon arrival and that she told them that she wanted Llamas beaten up. J.M.-R. stated that as he walked up to the residence, he heard a loud bang and observed his brother, ALEJANDRO leaving the scene without him. J.M.-R. stated he received a message from A.M.-M., telling him, "sorry someone must have put a bullet in the chamber." ALEJANDRO's and J.M.-R.'s parent consented to a search in which detectives located the clothes ALEJANDRO and J.M.-R. were seen wearing in the video showing them walking towards Llamas's residence.

Detectives responded to A.M.-M.'s residence. Detectives were informed by A.M.-M.'s father that he was at work and not at home. Detectives observed A.M.-M. standing behind his father and took him into custody. A search warrant was served on the residence and officers located clothing matching those seen in the security footage of the individuals seen walking towards Llamas's residence with I.S. and ALEJANDRO. Detectives responded to I.S.'s residence and took him into custody without incident.

A search warrant was served on NATALIE's cell phone and a download completed. GPS data showed that at 3:08 a.m. an entry for directions to Llamas's residence was entered. At 3:46 a.m. GPS data showed that an entry for direction from the location where J.M.-R. and V.V. were picked up to ARIANA and NATALIE's residence in Ogden was entered. A search warrant for the vehicle was served and a search completed. Detectives located a receipt for a purchase at a Maverick gas station for the night of October 13th around the time NICOLE, ALEJANDRO, A.M.-M., J.M.-R., V.V., and I.S. were in the vehicle. Detectives reviewed security footage from Maverick and observed all five males enter the Maverick. Footage shows A.M.-M. walking with ALEJANDRO and I.S. when he lifts his arm and holds his hand out like a gun. A.M.-M. is observed pretending to rack the gun and fire.

The medical examiner confirmed that Llamas died from a single gunshot wound that entered the front of his neck, passed through his cervical spine, and cut through his spinal cord. The medical examiner noted injuries to Jorge's face consistent with being struck and ruled the cause of death a

homicide.

MOTION FOR PRETRIAL DETENTION:

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

As referenced in the probable cause statement in this Information, there is substantial evidence based on witnesses confirming that the Defendant was seen inside the residence with A.M.-M., Ariana Aguilar and Natalie Aguilar when Llamas was shot. The Defendant admitted he entered the residence and then fled the scene after hearing the shots. The Defendant admitted that he entered the locked residence to “scare Llamas for putting hands” on Ariana. Witnesses placed the Defendant inside Llamas’s room when the shots were fired and observed him fleeing the scene when Ariana told them to go. The Defendant then proceeded to leave the scene and return to the area a few minutes later when he realized that his brother, J.M.-R., was not with them. Security footage shows the Defendant walking towards the residence with the shooter, A.M.-M., a few minutes prior to the shooting. Co-defendants confirmed that a weapon was clearly observed on A.M.-M. as they all entered the residence, showing that the Defendant was aware of the weapon. Maverick security footage shows the Defendant walking into the store with A.M.-M. as he holds up his arm and hand mimicking a gun, pretending to rack the gun and fire it. The investigation has shown that the Defendant was clearly aware that A.M.-M. had a weapon on him prior to arriving at the residence and entered the residence with the weapon in hand.

The Defendant has shown that he is a risk to the community by entering a residence, which was locked, to commit an assault. The Defendant then watched A.M.-M. strike Llamas and shoot him before fleeing the scene. The Defendant was hesitant to provide information to the police when approached and provided only minor details about the incident claiming he was not the room when the shooting took place. Witnesses confirmed they saw the Defendant run from the bedroom and flee out the door, showing that the Defendant knew exactly what occurred. The State is also concerned that if the Defendant is released, he and his family will retaliate against the witnesses who have come forward to provide information regarding the shooting. As such, the State requests that a No Bail warrant be issued and the Defendant held.

Pursuant to Utah Code Annotated § 78B-18a-106 (2018) 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: 22nd day of October, 2024

/s/ KEVIN BARRETT

Declarant

Subscribed and sworn to before me this 22nd day of
October, 2024

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Joshua Graves

Deputy District Attorney
22nd day of October, 2024
JG / KF / DAO # 24.018855

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
Third District Court, SALT LAKE DEPARTMENT			24.018842	Count 1 76-5-203 MURDER (First Degree Felony) Count 2 76-6-203 AGGRAVATED BURGLARY (First Degree Felony) Count 3 76-8-306(2)+(3A) OBSTRUCTION OF JUSTICE - CAPI... (Second Degree Felony) Count 4 76-8-306(2)+(3A) OBSTRUCTION OF JUSTICE - CAPI... (Second Degree Felony) Count 5 76-8-508.3 RETALIATION AGAINST A WITNESS... (Third Degree Felony)