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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,

vs.

CHARLES SHELDON BATES
DOB: 11/04/1963
1762 West Norman Drive
West Valley City, UT 84119
OTN#: 68249606
SO#: 433838
Booking#: 25018991

Defendant.

Screened by: JENNIFER ZELENY
Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 25.006469

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: IN JAIL PRD
04/24/2025

Case No.

The undersigned 4962 Officer Alexandra Clayton - Unified Police Department, Agency Case No. CO22-57787, upon a written declaration states on information and belief that the defendant, CHARLES SHELDON BATES, committed the crime(s) of:

COUNT 1

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about July 8, 1988 through December 31, 1989 in Salt Lake County, the defendant did engaged in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Penis in RBs mouth

COUNT 2

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2007 in Salt Lake County, the defendant did engaged in a

sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Mouth on MBs penis

COUNT 3

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2007 in Salt Lake County, the defendant did engaged in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Mouth on MBs anus

COUNT 4

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2009 in Salt Lake County, the defendant did engaged in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Mouth on CCs penis in bathroom

COUNT 5

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2009 in Salt Lake County, the defendant did engaged in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Penis to CCs anus

COUNT 6

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2009 in Salt Lake County, the defendant did , (1) under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child, or cause a child to take indecent liberties with the actor or another with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and

(2)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping;

(b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense;

(c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense;

(d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense;

(e) the accused, prior to sentencing for this offense, was previously convicted of any felony, or of a misdemeanor involving a sexual offense;

(f) the accused committed the same or similar sexual act upon two or more victims at the same time

or during the same course of conduct;

(g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense;

(h) the offense was committed by a person who occupied a position of special trust in relation to the victim; position of special trust means that position occupied by a person in a position of authority, who, by reason of that position is able to exercise undue influence over the victim, and includes, but is not limited to, a youth leader or recreational leader who is an adult, adult athletic manager, adult coach, teacher, counselor, religious leader, doctor, employer, foster parent, baby-sitter, adult scout leader, natural parent, stepparent, adoptive parent, legal guardian, grandparent, aunt, uncle, or adult cohabitant of a parent;

(i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or

(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth.

The presumptive sentence for a conviction of this offense is 15 years to life. Imprisonment is mandatory. To Wit: Touched CCs penis in bathroom, first time

COUNT 7

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2009 in Salt Lake County, the defendant did , (1) under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child, or cause a child to take indecent liberties with the actor or another with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and

(2)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping;

(b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense;

(c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense;

(d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense;

(e) the accused, prior to sentencing for this offense, was previously convicted of any felony, or of a misdemeanor involving a sexual offense;

(f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct;

(g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense;

(h) the offense was committed by a person who occupied a position of special trust in relation to the victim; position of special trust means that position occupied by a person in a position of authority,

who, by reason of that position is able to exercise undue influence over the victim, and includes, but is not limited to, a youth leader or recreational leader who is an adult, adult athletic manager, adult coach, teacher, counselor, religious leader, doctor, employer, foster parent, baby-sitter, adult scout leader, natural parent, stepparent, adoptive parent, legal guardian, grandparent, aunt, uncle, or adult cohabitant of a parent;

- (i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or
- (j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth.

The presumptive sentence for a conviction of this offense is 15 years to life. Imprisonment is mandatory. To Wit: Touched CCs penis in bathroom, another time

COUNT 8

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2009 in Salt Lake County, the defendant did , (1) under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child, or cause a child to take indecent liberties with the actor or another with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and

(2)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping;

(b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense;

(c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense;

(d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense;

(e) the accused, prior to sentencing for this offense, was previously convicted of any felony, or of a misdemeanor involving a sexual offense;

(f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct;

(g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense;

(h) the offense was committed by a person who occupied a position of special trust in relation to the victim; position of special trust means that position occupied by a person in a position of authority, who, by reason of that position is able to exercise undue influence over the victim, and includes, but is not limited to, a youth leader or recreational leader who is an adult, adult athletic manager, adult coach, teacher, counselor, religious leader, doctor, employer, foster parent, baby-sitter, adult scout leader, natural parent, stepparent, adoptive parent, legal guardian, grandparent, aunt, uncle, or adult cohabitant of a parent;

(i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by

the victim with any other person, or sexual performance by the victim before another person; or
(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth.

The presumptive sentence for a conviction of this offense is 15 years to life. Imprisonment is mandatory. To Wit: Touched CCs butt in bathroom, first time

COUNT 9

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2009 in Salt Lake County, the defendant did , (1) under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child, or cause a child to take indecent liberties with the actor or another with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and

(2)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping;

(b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense;

(c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense;

(d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense;

(e) the accused, prior to sentencing for this offense, was previously convicted of any felony, or of a misdemeanor involving a sexual offense;

(f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct;

(g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense;

(h) the offense was committed by a person who occupied a position of special trust in relation to the victim; position of special trust means that position occupied by a person in a position of authority, who, by reason of that position is able to exercise undue influence over the victim, and includes, but is not limited to, a youth leader or recreational leader who is an adult, adult athletic manager, adult coach, teacher, counselor, religious leader, doctor, employer, foster parent, baby-sitter, adult scout leader, natural parent, stepparent, adoptive parent, legal guardian, grandparent, aunt, uncle, or adult cohabitant of a parent;

(i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or

(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth.

The presumptive sentence for a conviction of this offense is 15 years to life. Imprisonment is mandatory. To Wit: Touched CCs butt in bathroom, another time

COUNT 10

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.1(4), a First Degree Felony, as follows: That on or about January 1, 2006 through December 31, 2009 in Salt Lake County, the defendant did , (1) under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child, or cause a child to take indecent liberties with the actor or another with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and

(2)(a) the offense was committed by the use of a dangerous weapon as defined in Utah Code §76-1-601, or by force, duress, violence, intimidation, coercion, menace, or threat of harm, or was committed during the course of a kidnapping;

(b) the accused caused bodily injury or severe psychological injury to the victim during or as a result of the offense;

(c) the accused was a stranger to the victim or made friends with the victim for the purpose of committing the offense;

(d) the accused used, showed, or displayed pornography or caused the victim to be photographed in a lewd condition during the course of the offense;

(e) the accused, prior to sentencing for this offense, was previously convicted of any felony, or of a misdemeanor involving a sexual offense;

(f) the accused committed the same or similar sexual act upon two or more victims at the same time or during the same course of conduct;

(g) the accused committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in Utah Code §76-5, and were committed at the same time, or during the same course of conduct, or before or after the instant offense;

(h) the offense was committed by a person who occupied a position of special trust in relation to the victim; position of special trust means that position occupied by a person in a position of authority, who, by reason of that position is able to exercise undue influence over the victim, and includes, but is not limited to, a youth leader or recreational leader who is an adult, adult athletic manager, adult coach, teacher, counselor, religious leader, doctor, employer, foster parent, baby-sitter, adult scout leader, natural parent, stepparent, adoptive parent, legal guardian, grandparent, aunt, uncle, or adult cohabitant of a parent;

(i) the accused encouraged, aided, allowed, or benefited from acts of prostitution or sexual acts by the victim with any other person, or sexual performance by the victim before another person; or

(j) the accused caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth.

The presumptive sentence for a conviction of this offense is 15 years to life. Imprisonment is mandatory. To Wit: Hand on CCs penis in car

COUNT 11

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Finger in CC's

anus, first time

COUNT 12

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Finger in CC's anus, another time

COUNT 13

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Mouth on CCs penis, first time

COUNT 14

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Mouth on CCs penis, another time

COUNT 15

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Penis in CCs anus, first time

COUNT 16

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Penis in CCs anus, another time

COUNT 17

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: CC's finger in BATES' anus, first time

COUNT 18

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20,

2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: CC's finger in BATES' anus, another time

COUNT 19

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: CC's penis in BATES' anus, first time

COUNT 20

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: CC's penis in BATES' anus, another time

COUNT 21

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: CCs mouth on BATES' penis, first time

COUNT 22

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: CCs mouth on BATES' penis, another time

COUNT 23

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 14, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Mouth on CC's penis camping

COUNT 24

OBJECT RAPE, 76-5-402.2, a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did :
without the victim's consent, cause the penetration, however slight, of the genital or anal opening of another person who is 14 years of age or older, by any foreign object, substance, instrument, or device, including a part of the human body other than the mouth or genitals, with intent to cause

substantial emotional or bodily pain to the victim or with the intent to arouse or gratify the sexual desire of any person. To Wit: Dildo in CCs anus, first time

COUNT 25

OBJECT RAPE, 76-5-402.2, a First Degree Felony, as follows: That on or about January 20, 2010 through March 21, 2014 in Salt Lake County, the defendant did :

without the victim's consent, cause the penetration, however slight, of the genital or anal opening of another person who is 14 years of age or older, by any foreign object, substance, instrument, or device, including a part of the human body other than the mouth or genitals, with intent to cause substantial emotional or bodily pain to the victim or with the intent to arouse or gratify the sexual desire of any person. To Wit: Dildo in CCs anus, another time

COUNT 26

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 14, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: CC's hand on DE's Penis

COUNT 27

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about January 20, 2010 through March 14, 2014 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: DE's hand on CC's penis

COUNT 28

OBJECT RAPE, 76-5-402.2, a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did :

without the victim's consent, cause the penetration, however slight, of the genital or anal opening of another person who is 14 years of age or older, by any foreign object, substance, instrument, or device, including a part of the human body other than the mouth or genitals, with intent to cause substantial emotional or bodily pain to the victim or with the intent to arouse or gratify the sexual desire of any person. To Wit: Dildo in DEs anus, first time

COUNT 29

OBJECT RAPE, 76-5-402.2, a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did :

without the victim's consent, cause the penetration, however slight, of the genital or anal opening of another person who is 14 years of age or older, by any foreign object, substance, instrument, or device, including a part of the human body other than the mouth or genitals, with intent to cause substantial emotional or bodily pain to the victim or with the intent to arouse or gratify the sexual desire of any person. To Wit: Dildo in DEs anus, another time

COUNT 30

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22,

2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: DEs mouth on penis before first penis to DEs anus penetration

COUNT 31

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: DEs mouth on penis before second penis to DEs anus penetration

COUNT 32

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Mouth on DEs penis before first penis to DEs anus penetration

COUNT 33

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Mouth on DEs penis before second penis to DEs anus penetration

COUNT 34

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Mouth on DEs penis in hot tub

COUNT 35

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Mouth on DEs penis in bathroom

COUNT 36

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: DEs mouth on penis in bedroom, first time

COUNT 37

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: DEs mouth on penis in bedroom, another time

COUNT 38

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Penis in DEs anus, first time

COUNT 39

FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about August 22, 2009 through December 31, 2010 in Salt Lake County, the defendant did engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Penis in DEs anus, another time

COUNT 40

SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2019 through July 21, 2019 in Salt Lake County, the defendant did engage in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Mouth on LLs penis

COUNT 41

AGGRAVATED SEXUAL ABUSE OF A CHILD, 76-5-404.3, a First Degree Felony, as follows: That on or about January 1, 2019 through July 21, 2019 in Salt Lake County, the defendant did under circumstances not amounting to rape of a child, object rape of a child, sodomy upon a child, or an attempt to commit any of these offenses, touch the anus, buttocks, pubic area, or genitalia of any child, the breast of a female child, or otherwise did take indecent liberties with a child with intent to cause substantial emotional or bodily pain to any person or with the intent to arouse or gratify the sexual desire of any person regardless of the sex of any participant; and

(i) committed the offense:

(A) by the use of a dangerous weapon;

(B) by force, duress, violence, intimidation, coercion, menace, or threat of harm; or

(C) during the course of a kidnaping the defendant;

(ii) caused bodily injury or severe psychological injury to the child during or as a result of the offense;

(iii) was a stranger to the child or made friends with the child for the purpose of committing the offense;

(iv) used, showed, or displayed pornography or caused the child to be photographed in a lewd

condition during the course of the offense;

(v) prior to sentencing for this offense, was previously convicted of any sexual offense;

(vi) committed the same or similar sexual act upon two or more individuals at the same time or during the same course of conduct;

(vii) committed, in Utah or elsewhere, more than five separate acts, which if committed in Utah would constitute an offense described in this chapter, and were committed at the same time, or during the same course of conduct, or before or after the instant offense;

(viii) occupied a position of special trust in relation to the child;

(ix) encouraged, aided, allowed, or benefitted from acts of prostitution or sexual acts by the child with any other individual, sexual performance by the child before any other individual, human trafficking, or human smuggling; or

(x) caused the penetration, however slight, of the genital or anal opening of the child by any part or parts of the human body other than the genitals or mouth. To Wit: Hand on LLs penis and testicles

COUNT 42

ATTEMPTED SODOMY UPON A CHILD, 76-5-403.1, a First Degree Felony, as follows: That on or about January 1, 2019 through July 21, 2019 in Salt Lake County, the defendant did attempt to engage in a sexual act upon or with a child under the age of 14, involving the genitals or anus of the actor or the child and the mouth or anus of either person, regardless of the sex of either participant. To Wit: Attempted to put LLs penis in mouth in garage

COUNT 43

ATTEMPTED FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about July 22, 2019 through December 31, 2020 in Salt Lake County, the defendant did attempt to engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Asked LL to suck on his penis, first time

COUNT 44

ATTEMPTED FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about July 22, 2019 through December 31, 2020 in Salt Lake County, the defendant did attempt to engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Asked LL to suck on his penis, another time

COUNT 45

ATTEMPTED FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about July 22, 2019 through December 31, 2020 in Salt Lake County, the defendant did attempt to engage in any sexual act with a person 14 years of age or older, and without that person's consent, involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Attempted to have sex with LL, first time

COUNT 46

ATTEMPTED FORCIBLE SODOMY, 76-5-403(2), a First Degree Felony, as follows: That on or about July 22, 2019 through December 31, 2020 in Salt Lake County, the defendant did attempt to engage in any sexual act with a person 14 years of age or older, and without that person's consent,

involving the genitals of one person and the mouth or anus of another person, however slight the touch. To Wit: Attempted to have sex with LL, another time

COUNT 47

FORCIBLE SEXUAL ABUSE, 76-5-404, a Second Degree Felony, as follows: That on or about July 22, 2019 through December 31, 2020 in Salt Lake County, the defendant did , when the victim was 14 years of age or older and, under circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: touched LLs penis in truck, first time

COUNT 48

FORCIBLE SEXUAL ABUSE, 76-5-404, a Second Degree Felony, as follows: That on or about July 22, 2019 through December 31, 2020 in Salt Lake County, the defendant did , when the victim was 14 years of age or older and, under circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: touched LLs penis in truck, another time

COUNT 49

FORCIBLE SEXUAL ABUSE, 76-5-404, a Second Degree Felony, as follows: That on or about July 22, 2019 through December 31, 2020 in Salt Lake County, the defendant did , when the victim was 14 years of age or older and, under circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: Rubbed penis on LLs buttocks, first time

COUNT 50

FORCIBLE SEXUAL ABUSE, 76-5-404, a Second Degree Felony, as follows: That on or about July 22, 2019 through December 31, 2020 in Salt Lake County, the defendant did , when the victim was 14 years of age or older and, under circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: Rubbed penis on LLs buttocks, another time

COUNT 51

FORCIBLE SEXUAL ABUSE, 76-5-404(3)(A), a Second Degree Felony, as follows: That on or about May 1, 2022 through May 31, 2022 in Salt Lake County, the defendant did , under

circumstances not amounting to rape, object rape, forcible sodomy, or attempted rape or forcible sodomy, the actor touches the anus, buttocks, pubic area, or any part of the genitals of another, or touches the breast of a female, or otherwise takes indecent liberties with another, with intent to cause substantial emotional or bodily pain to any individual or with the intent to arouse or gratify the sexual desire of any individual, without the consent of the other, regardless of the sex of any participant. To Wit: Touched MP's penis

COUNT 52

RETALIATION AGAINST A WITNESS, VICTIM, OR INFORMANT, 76-8-508.3, a Third Degree Felony, as follows: That on or about June 17, 2022 in Salt Lake County, the defendant did believing that an official proceeding or investigation was pending, was about to be instituted, or had been concluded,

(a)(i) make a threat of harm; or

(ii) cause harm; and

(b) directed the threat or action:

(i) against a witness or an informant regarding any official proceeding, a victim of any crime, or any person closely associated with a witness, victim, or informant; and

(ii) as retaliation or retribution against the witness, victim, or informant. To Wit: M.P.

COUNT 53

AGG KIDNAPPING IN THE COURSE OF COMMITTING UNLAWFUL DETENTION, 76-5-302(3)(A), a Third Degree Felony, as follows: That on or about June 17, 2022 in Salt Lake County, the defendant did in the course of committing unlawful detention:

(a) uses or threatens to use a dangerous weapon; or

(b) acts with the intent to:

(i) hold the victim for ransom or reward, 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) facilitate the commission, attempted commission, or flight after commission or attempted commission of a felony;

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

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

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

(vi) commit a sexual offense as described in Title 76, Chapter 5, Part 4, Sexual Offenses. To Wit: M.P.

COUNT 54

STALKING, 76-5-106.5(3)(A)(I), a Class A Misdemeanor, as follows: That on or about June 17, 2022 in Salt Lake County, the defendant did intentionally or knowingly engage in a course of conduct directed at a specific person and knew or should have known that the course of conduct would cause a reasonable person:

(i) to fear for the person's own safety or the safety of a third person; or

(ii) to suffer other emotional distress; or

(b) violates:

(i) a stalking injunction issued under Title 78B, Chapter 7, Part 7, Civil Stalking Injunctions; or

(ii) a permanent criminal stalking injunction issued under Title 78B, Chapter 7, Part 9, Criminal Stalking Injunctions. To Wit: M.P.

COUNT 55

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9115 045

COUNT 56

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9123 053

COUNT 57

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9168 098

COUNT 58

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9172 102

COUNT 59

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9191 121

COUNT 60

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9113 043

COUNT 61

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9131 061

COUNT 62

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9134 064

COUNT 63

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9135 065

COUNT 64

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CRW_9137 067

COUNT 65

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image DSC00065 004

COUNT 66

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image DSC00062 001

COUNT 67

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image DSC00063 002

COUNT 68

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image DSC00066 005

COUNT 69

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image DSC00067 006

COUNT 70

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image DSC00064 003

COUNT 71

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image IM001219 003

COUNT 72

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows:
That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image IM001223 007

COUNT 73

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image IM001225 009

COUNT 74

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image IM001224 008

COUNT 75

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image BV000022

COUNT 76

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image BV000042

COUNT 77

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image BV000044

COUNT 78

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image BV000045

COUNT 79

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image CUTEKISS

COUNT 80

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image LIL_SIS3

COUNT 81

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image LITTLELZ

COUNT 82

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image LL-C1-14

COUNT 83

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image LL-C1-27

COUNT 84

SEXUAL EXPLOITATION OF A MINOR, 76-5B-201(3)(A), a Second Degree Felony, as follows: That on or about January 1, 2022 through December 31, 2022 in Salt Lake County, the defendant did knowingly possesses or intentionally view child pornography To Wit: Image LL-P1-43

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

Alexandra Clayton, K.B., M.B., R.B., C.C., D.E., D.O., L.L., and M.P.

DECLARATION OF PROBABLE CAUSE:

Your Declarant bases the Information upon the following:

The statement of Detective Clayton of the Unified Police Department that she investigated a report of sexual abuse. M.B. reported in 2006, when he was approximately 6 or 7, his father, defendant CHARLES SHELDON BATES, "sexually assaulted" him. M.B. recalled that the first incident occurred in BATES' bedroom. M.B. said he was lying on the bed with BATES, and BATES sucked on his penis. M.B. said it "tickled."

M.B. said the second time, BATES told him to go in the shower. BATES recalled that after the shower, he was lying on his back, on BATES' bed, when BATES "lifted his legs up with one hand and licked his buttohole." BATES told M.B. not to tell anyone or "he would get in trouble."

M.B. said he believed there were other incidents but was unsure because the events were "traumatic" and he was "so young."

K.B. reported to Detective Christensen that when she was between the ages of 8 and 18, her father, BATES, sexually abused her friends. K.B. reported she and her friend, C.C., were at a game when C.C. told her that he and BATES were "boyfriends." K.B. said BATES and C.C. would lock the door in the bathroom, and BATES used her as a "watchdog." K.B. recalled an incident in 2007 or 2008 when they were leaving Park City and on the way home when she observed BATES playing with C.C.'s penis. K.B. described that C.C.'s pants were open, and BATES was "stroking (C.C.) off" in front of her. K.B. said BATES told her that "you can't rape the willing" and "it's not rape if there is consent." K.B. also reported she observed BATES "suck on (C.C.'s) penis." K.B. stated when she was 10 or 11, she observed BATES "bend over and suck on (C.C.'s) penis." K.B. said this

“happened lots.”

K.B. reported BATES was a Scout Leader and “groomed” young men at the “young men or the boy scout program back then.” K.B. reported she knew BATES had also abused L.L., B.M., and D.O.. K.B. recounted BATES having a “large backdrop set up in the living room where (BATES) took nude photos of D.O.” K.B. said he also took photos of D.O. in their bathroom. K.B. said she saw photos of (D.O.) naked on their computer around 2008, and there were “lots of photos.” K.B. described that the pictures showed D.O.’s penis and testicles.

K.B. stated BATES offered to pay for a hotel room for her and D.O. to have sex. BATES also offered to show K.B. how to give a “blow job or hand job.” K.B. said BATES never touched her, but she had “been exposed to all the things that have happened.”

C.C. reported he met BATES through K.B. and was in Boy Scouts when BATES became a scout leader. C.C. said what started as going to the pool with BATES taking photos of him in his swim trunks and “light touching” eventually turned into “oral sex and eventually anal sex.” C.C. believed it started when he was 10 years old and ended when he sent BATES an email telling BATES they should not see each other anymore.

C.C. said the abuse began with BATES taking photos of him, shirtless, in BATES’ basement. C.C. said, at first, the pictures taken were of him wearing swimsuits, but later, nude photos were taken. BATES told C.C. he needed to take the pictures for “Boy Scouts,” and BATES continued for approximately one year. C.C. described that the photographs turned into “light touching” over the clothes and recalled that during a photo session with swimming trunks, BATES would “stroke his butt” or “cup his genitals.” C.C. said he did not know how many times because “it became normal.” C.C. said there were photo sessions approximately every week, and the touching occurred during “every session they took photos.” C.C. recalled the camera being a digital camera and believed the photographs were stored digitally.

C.C. said BATES took him to the pool every couple of weeks, and he would have a “minor amount of kind of trepidation over what (he) was pretty sure was going to happen at the end...” C.C. said when he started going to the pool more regularly with BATES, the “light touching” turned into “heavier touching.” C.C. recalled one time when he was approximately 12 or 13, at the pool, BATES took him into the family restroom, and the “heavier touching” started there. He said it was “pretty much every time they went, and it happened probably 50-60 times.” C.C. noted the “heavy touching” happened for approximately one month before the “oral sex began.” C.C. said they would shower naked, and BATES would “stroke and pet” his genitals, then masturbate C.C. and “stroke his butt.” C.C. said it was around this same time that BATES first performed oral sex on him, which occurred in the family bathroom at the pool. BATES told him, “This will feel good,” and made C.C. stand against the wall. BATES then got on his knees and “sucked” C.C. He estimated BATES performed oral sex on him approximately 30-40 times, and he believed he was no older than 14. C.C. reported it was hard to tell if BATES was “erect because he was a big guy and had folds.”

C.C. said they began having anal sex when he was approximately 14 and recalled the first time BATES penetrated his anus with his finger “during a petting session with oral.” C.C. said BATES had him put his finger inside of BATES’ anus, and then BATES did it to C.C. He said the

"fingering" occurred at the pool, in the shower at BATES' house, and in his bedroom. He believed BATES digitally penetrated his anus four to five times, and he digitally penetrated BATES' anus four to five times. C.C. said BATES also had him penetrate his anus with his penis approximately three times in BATES' bedroom.

C.C. said when he was 16, BATES got him a phone, and they would meet up at private locations, and there would be "touching and oral." C.C. said BATES would perform oral sex on him, and he would then give BATES oral sex. C.C. said the last time something happened was during a lunch session; during that visit, there was touching over the clothes and kissing. C.C. described that during the later visits, they had scaled down the oral sex. C.C. said he had learned this was not normal behavior, and the oral sex made him feel weird and uncomfortable, but he felt like he owed BATES for "being so nice to him."

C.C. said while in Boy Scouts, they would share a room, and "heavy touching and oral would happen." C.C. said he sent an email to BATES ending things in 2014.

During the investigation, C.C. was shown photos located in BATES' home. He identified himself in the photos and believed he was between 9 and 11 when BATES took pictures of him.

D.E. reported he met BATES through C.C. and started hanging out at BATES' house. D.E. recalled he and C.C. were biking, and C.C. pulled his pants down and "played with him." D.E. recalled BATES being there and telling him that he and C.C. "do that all the time." D.E. said BATES began picking him up under the guise of getting "merit badges"; however, they "just went back to his place and they played with each other." D.E. said this happened "a lot" during junior high. D.E. recalled the first time something happened; he was at BATES' house with C.C., and he and C.C. "were doing things." D.E. said BATES "was also doing things." D.E. said BATES "was erect most of the time."

D.E. said another time, BATES "tried to penetrate him," but he "was not ready for that." D.E. described that they were in BATES' room, and he was on "all fours." D.E. said BATES' penis went inside his "ass," and BATES told him that it "was okay" and it "was natural." BATES then suggested they could "try his bar," which D.E. described as a bar that was like a dildo shape. D.E. said BATES used it on both him and C.C. D.E. said before BATES penetrated him, BATES "played with him."

D.E. said one time BATES "orally stimulated him," and he "orally stimulated" BATES. BATES then put his penis inside him. D.E. said the third time, they again "orally stimulated" each other, and the BATES inserted his penis into his anus. D.E. recalled BATES telling him to "relax, and he would get used to it."

D.E. said one time, they were at the pool and in the hot tub when BATES whispered in his ear and told him that "he could suck him there in the hot tub." When D.E. nodded his head, BATES "gathered air and went down and pulled his pants down and started sucking him." D.E. said they also did things in the family bathroom at the pool and recalled that BATES sucked both his and C.C.'s penis. D.E. recalled that BATES got mad at him and C.C. for "not sucking his penis." D.E. said on the way home from the pool, BATES told him, "Don't worry, he would teach him something called

make-up sex."

D.E. said BATES asked him to perform oral sex on him in BATES' bedroom. D.E. recalled that he "got distracted because he did not really enjoy it, and his dick would shrink and go into his skin, into a little cave area, and he would have to use his hand to get it back out." He then would give BATES oral sex. D.E. said BATES also sucked his penis and played with him. D.E. said the last time he remembers oral sex happening, they were in BATES' room, and BATES was sucking on D.E.'s penis and playing with him. D.E. said he ejaculated in BATES' mouth, and he swallowed it. BATES then kissed D.E.

D.E. said BATES had a computer and would show him pictures of kids with their shirts off and nude photos of kids. BATES told D.E. to keep the photos a secret.

D.E. said he told his mom that BATES bought him underwear and would rub lotion on his butt. He said that was when it ended with BATES because his mom would no longer allow him to go over there. He believed he was still in junior high school, and the abuse happened for approximately one year.

L.L. reported to Detective Christensen that he met BATES in 2019 through a friend and began going to his house to work on cars. L.L. said he was in BATES' garage one day inside the "shop area." L.L. said BATES asked L.L. to pull his pants and underwear down. BATES then "would just do what he would normally do and get on his knees." L.L. said BATES then "sucked his dick for 5-10 seconds" and "used his tongue to rub (his) dick to make (him) fully erect." L.L. described that once his penis was "fully grown," BATES "did what he wanted to do." L.L. believed he was 13 or 14 when this incident occurred, and BATES put his "dick" in his mouth one time.

L.L. said another time when they were in BATES' garage, BATES got on his knees and pulled his pants and underwear down. L.L. said he believed BATES was going to try and suck on his penis and told him to stop, which he did. L.L. said BATES then complained that L.L. made him "get on his knees" for no reason. L.L. said BATES asked him to "suck his dick" three to four times, and each time he said "no."

L.L. said there were a couple of times when BATES would attempt to suck on his penis in his bedroom, and while in the bedroom, BATES would try to kiss L.L. L.L. said the first time was a month or two after he started hanging out with BATES. He described that BATES walked up to him and asked if L.L. wanted a kiss, then told him to "open up his peckers." BATES then "leaned down and kissed (L.L.) on the lips. L.L. said BATES kissed him a lot on the lips and often asked if L.L. was going to "open up his lips so they could properly kiss."

L.L. said he asked BATES about the "Cub Scout things that he did that got him kicked out of Cub Scouts." BATES told him that everything that was said about him and the Cub Scouts was true and that he would "try to do sexual acts with the boys at Boy Scouts." L.L. said BATES also told him that K.B.'s boyfriend would "suck his dick all the time."

L.L. reported BATES tried to bribe him into having sex with him and told L.L. that he would lower the cost of the trust he was trying to buy if L.L. had sex with him. BATES also tried to bribe

L.L. with tools if L.L. sucked on BATES' "dick." L.L. said he believed BATES tried to bribe him to have sex with him three or four times, but he refused.

L.L. said BATES asked him to shower with him approximately five to six times at the Rec Center, but he always said "no."

L.L. described a time when BATES put his hand in his pants and explained that he had a pair of pants with a hole in them. L.L. said the first time it happened, they were at BATES' house, and BATES put his hand inside L.L.'s shorts and felt his penis, and said, "Oh, look at this surprise." L.L. said BATES was "feeling" his "dick and balls." L.L. said the second time this happened, they were driving somewhere, and BATES reached under L.L.'s underwear and rubbed his "dick and balls" with his hand. L.L. believed this happened six to seven times.

L.L. said BATES tried to "hump" him and said there was a time when BATES walked up and "rubbed his dick" on his "butt." L.L. said he felt the "bulge" rubbing against him.

L.L. advised that he stopped "seeing" BATES at the beginning of 2020 and estimated that was around the time the COVID-19 pandemic began.

D.O. stated he hung out at BATES' home with K.B. D.O. said BATES told him that he wanted to be a photographer and would take "weird" photos of him in his underwear. D.O. recalled the pictures were taken in front of a green screen and believed they were taken in the living room. D.O.'s mom, G.O., identified D.O. in the photos in BATES' home.

M.P. reported he met BATES through L.L. in 2021. M.P. said that on June 17, 2022, as documented in UPD CRN 22-57555, he was pulling into the high school parking lot to pick up his girlfriend when he observed BATES waiting in the parking lot. M.P. said he immediately pulled out of the parking lot because he did not want to talk to BATES. However, BATES told him he wanted to talk. M.P. said BATES chased him in his car. M.P. said he was "trying to lose him," but BATES followed him. M.P. said BATES got into the middle lane on the road, sped up, got in front of him, and hit his brakes, causing M.P. to hit BATES' truck. M.P. said BATES then got out of his vehicle and tried to hold his truck down, telling M.P. to hit him. M.P. said he was able to back up and flip around, then drive to an apartment complex to hide from BATES.

M.P. said approximately one month before that incident, he was at BATES' house working on his car and got in his car to leave. However, BATES wanted M.P. to stay. M.P. described that his window was down when BATES reached into his car through the window and grabbed his penis. M.P. told BATES to get off him, but BATES did not listen. M.P. said he grabbed BATES' hand and moved his hands off his genitals. M.P. believed he was 18 at the time of this incident.

R.B. reported BATES is his uncle, and the first time "something happened" was when he fell asleep on BATES' bed. R.B. recalled that he woke up to BATES "pulling his pants down and trying to penetrate him." R.B. said when he woke up, he pulled his pants up and ran out of the room. R.B. described feeling BATES' penis pressing against his butt. R.B. believed he was six when this incident occurred. R.B. said approximately one week later, he was sleeping at his grandma's house and fell asleep on the couch. R.B. said when he woke up, he was in BATES' room, and "his anus felt

sore.”

R.B. said last time something happened, BATES forced his penis in his mouth. R.B. said he was getting ready to fall asleep when BATES walked into the bedroom and was next to the bed. R.B. said when he woke up, BATES’ penis was inside his mouth, and his “first reaction was to bite down.” R.B. said BATES jumped back, and he observed BATES was naked. R.B. believed this occurred in 1988. R.B. said he couldn’t recall how often BATES sexually abused him, but every time it happened, it was “when he was asleep or dozing off.”

In 2022, Officers responded to BATES’ residence and spoke with his estranged wife, K.B. who provided CDs, a mini-SD card, and a computer. K.B. said she viewed the CDs and observed nude photos of males and females. K.B. said she also viewed a disk labeled “CC” which contained nude and clothed photos of C.C. Detective Clayton reviewed the five disks provided by BATES’ family and located 134 images of CSAM.

- A disk created on June 8, 2009, contained 14 photos of D.O. taken in front of a green screen. A description of the photos is as follows:

- o Image CRW_9115 045 shows D.O. in the early stages of puberty standing up. D.O. is completely nude and has a colorful bracelet on his wrist. D.O.’s body is positioned at an angle and his penis can be seen in the photo. The photo was taken in front of a green screen.

- o Image CRW_9123 053 shows D.O. in the early states of puberty. His face is not shown, but the same bracelet is observed in the photo. The photo is a close-up view of his body, which is positioned at an angle, and his penis is observed.

- o Image CRW_9168 098 shows D.O. in the early stages of puberty. D.O. is observed standing in the photo, nude, with his hands on his hips. D.O.’s penis and testicles are observed in the photo.

- o Image CRW_9172 102 shows D.O. in front of the green screen wearing the same bracelet as depicted in the other photos. The photo shows a close-up of his penis and testicles at an angle.

- o Image CRW_9191 121 shows D.O. in the early stages of puberty, sitting on the ground in front of the green screen. D.O. is nude and his legs are spread open exposing his penis and testicles.

- o Image CRW_9113 043 shows D.O. standing up and angled to the right. D.O. is nude in front of a green screen and his penis and testicles are observed.

- o Image CRW_9131 061 shows D.O. in front of the green screen at an angle. D.O. is nude, standing with his arms crossed in front of his chest and his penis and testicles are observed.

- o Image CRW_9134 064 shows D.O. standing in front of the green screen with his arms crossed in front of his chest. D.O. is nude and his penis and testicles are observed.

- o Image CRW_9135 065 shows D.O. standing in front of the green screen with his arms crossed in front of his chest. He is nude and his penis and testicles are shown from a slight angle.

o Image CRW_9137 067 shows D.O. standing in front of the green screen, nude. The photo is taken from an upward angle, and his penis and testicles are shown from an angle.

- A disk created on April 22, 2009 contained 11 child sexual abuse material photos of C.C. and a second disk labeled "CC" contained six additional photos of C.C. and seven child sexual abuse material photos of an unidentified child. A description of the photos featuring C.C. are as follows:

o Image DSC00065 004 shows a young male, identified as C.C. in the early stages of puberty. C.C. is nude and lying on his back with his legs spread apart. C.C.'s penis is exposed. The photo also depicts a tan sheet and brown, wooden headboard.

o Image DSC00062 001 shows C.C. in the early stages of puberty naked and lying on his back. His penis is exposed and is oriented downward on his testicles. The photo also depicts a tan sheet and brown, wooden headboard.

o Image DSC00063 002 shows C.C. in the early stages of puberty nude and lying on his back. His penis is exposed and is oriented upward. The photo also depicts a tan sheet and brown, wooden headboard.

o Image DSC00066 005 shows C.C. in the early stages of puberty nude and lying on his back. His penis and testicles are exposed, and his penis is oriented down to the left. The photo also depicts a tan sheet and brown, wooden headboard.

o Image DSC00067 006 shows C.C. in the early stages of puberty nude and lying on his back. His penis and testicles are exposed, and his penis is oriented downward. The photo also depicts a tan sheet and brown, wooden headboard.

o Image DSC00064 003 shows C.C. in the early stages of puberty nude and lying on his back. His legs are spread apart exposing his testicles and a portion of his penis, which is oriented upward. The photo also depicts a tan sheet and brown, wooden headboard.

o Image IM001219 003 shows C.C. wearing white underwear. The underwear is pulled down exposing his penis. C.C. appears to be prepubescent in the photo.

o Image IM001223 007 shows C.C. nude, standing, and exposing his penis. C.C. is observed touching the shaft of his penis with one finger. C.C. appears to be prepubescent in the photo. Red sheets are also observed in the photo.

o Image IM001225 009 shows C.C. standing up and exposing his penis. C.C. is observed holding his penis with both hands and the photo is taken close up on his exposed penis. Red sheets are observed in the photo and C.C. appears to be prepubescent.

o Image IM001224 008 shows C.C. sitting on the red sheet, naked, with his penis exposed. His penis is oriented downward. C.C. appears to be prepubescent.

- A disk with no label contained approximately 90 images of Child Sexual Abuse Material.

The description of the photos is as follows:

- o Image BV000022 shows two boys. Boy #1 is lying on his back, nude, with his penis exposed and Boy #2 is nude, leaning over touching his lips to Boy #1's penis. Both boys appear to be 8-10 years old and prepubescent.
- o Image BV000042 shows two nude children. Child #1 is a boy and Child #2's gender is unknown. Child #2 is observed lying face down with their buttocks in the air and reaching between their legs. Child #1 is observed holding his penis while kneeling. Child #1's penis appears to be inside Child #2.
- o Image BV000044 shows two nude children. Child #1 is a boy and Child #2's gender is unknown. Child #2 is observed lying face down on the bed with their buttocks in the air. Child #1 is kneeling, and his penis and testicles are observed. Child #2 is reaching under their body, through their legs, and is holding Child #1's penis with their fingers.
- o Image BV000045 shows two nude boys appearing to be 8-9 years old. Child #1 is sitting on top of Child #2's genitalia and Child #1's penis is exposed.
- o Image CUTEKISS shows two nude boys appearing to be 10-12 and prepubescent. The boys are standing up, kissing each other and their penises are shown and erect.
- o Image LIL_SIS3 shows two females. Female #1 appears to be 10-12 and prepubescent. She is observed nude and lying on a bed with her legs open and feet together and her vagina exposed. Female #2's breasts are exposed and developed. Female #2's hand is near the vagina of Female #1.
- o Image LITTLELZ shows two nude girls who appear to be 8-10 and prepubescent. Girl #1 is lying on her back with her legs open and vagina exposed. Girl #2 is lying next to Girl #1 and has her hands on Girl #1's vagina lips, spreading them apart. Girl #2's vagina is also exposed.
- o Image LL-C1-14 shows a girl approximately 6-8 and prepubescent. She is wearing a blue shirt and no bottoms. Her vagina is exposed, and she is seen sitting on top of a nude male. The male's penis is inserted into the girl's vagina.
- o Image LL-C1-27 shows a girl approximately 6-8 and prepubescent. The girl is wearing a blue shirt and no bottoms. The girl is sitting on what appears to be an adult male's face and his tongue is licking her vagina and his hands are next to his tongue, outside of the vagina.
- o Image LL-P1-43 shows three nude males on a mattress, one appearing to be an adult male and two male children. The adult male is lying on his back, his testicles are exposed, and his penis is inside the anus of Child #1. Child #1 is lying on top of the adult male and Child #2 has his mouth on Child #2's penis and Child #2's penis is inside the mouth of Child #1. Both male children appear to be prepubescent.

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 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;

The defendant, in this matter, used his position of trust as a father, an uncle, a Boy Scout Leader, and a churchgoer to prey upon these minor victims, spanning approximately 36 years. Beginning in 1986 the defendant sexually assaulted his nephew, who was six at the time. The defendant progressed from there to his son and then made his daughter be a “watchdog” while he abused multiple other victims. The defendant groomed each and every victim into believing the behavior and sexual abuse was “normal” and told each victim “Not to tell anyone,” and said that he would get in trouble, but they also would get in trouble. The defendant not only sexually abused these victims, but he also produced child pornography with two of the victims, posing them in a manner he wanted, snapping photos of them, and then keeping them until they were turned in to the police department by his family in 2022.

The victims, in this case, experienced a magnitude of abuse at the hands of the defendant. While the State is filing charges related to events that occurred over the last 36-plus years, it believes it’s essential to recognize that the defendant forced each of these victims to engage in sexual activity each time they were together, resulting in well over 51 sexual assaults, as filed in this case. The defendant, using coercion tactics and grooming, forced each victim to engage in sexual activity with him, and the number of charges filed does not diminish the abuse that these victims had to endure.

The defendant is presently charged with 46 first-degree felonies, 35 second-degree felonies, two third-degree felonies, and a class A misdemeanor. Based on the serious nature of the allegations, the State would request the defendant be held in custody without bail.

REQUEST FOR ISSUANCE OF A WARRANT:

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: 24th day of April, 2025

/s/ ALEXANDRA CLAYTON
Declarant

Subscribed and sworn to before me this 24th day of April, 2025

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Jennifer Zeleny
Deputy District Attorney
24th day of April, 2025
JZ / HI / DAO # 25.006469

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
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