

SIM GILL, Bar No. 6389  
District Attorney for Salt Lake County  
SAMUEL COMI, Bar No. 18758  
Deputy District Attorney  
35 East 500 South  
Salt Lake City, Utah 84111  
(385) 468-7600  
scomi@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.

**HOLLY SMITH**  
**DOB: 07/18/1992**  
**AKA: Holly Angelina Smith**  
**314 S Post St**  
**Salt Lake City, UT 84104**  
**OTN#: 68199504**  
**SO#: 406526**  
**SID#/BCI#: 1383095**  
**Booking#: 25008807**

Defendant.

JIMENEZ, ERIC  
DOB: 11/18/1987  
JIMENEZ, JOEY FREDERICK  
DOB: 05/26/1983  
ROBLES-PRIETO, JOSE FRANCISCO  
DOB: 10/03/1977  
Co-Defendant(s)

Screened by: SAMUEL COMI  
Assigned to: TO BE ASSIGNED

**INFORMATION**

DAO # 25.003377

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: **IN JAIL - PRD**  
**02/26/2025**

Case No.

Co-Defendant DAO# 25.003389

Co-Defendant DAO# 25.003387

Co-Defendant DAO# 25.003382

---

The undersigned Law Enforcement Officer AMY OLSEN - Salt Lake City Police Department, Agency Case No. 25-41362, upon a written declaration states on information and belief that the defendant, HOLLY SMITH, committed the crime(s) of:

COUNT 1

CHILD KIDNAPPING, 76-5-301.1, a First Degree Felony, as follows: That on or about February 21, 2025 in Salt Lake County, the defendant, as a party to the offense, did intentionally or knowingly, without authority of law, and by any means and in any manner, seized, confined, detained, or transported a child without the consent of the child's parent or guardian, or the consent of a person acting in loco parentis.

COUNT 2

CHILD ABUSE - INTENTIONALLY OR KNOWINGLY, 76-5-109(2)+(3A), a Class A Misdemeanor, as follows: That on or about February 21, 2025 in Salt Lake County, the defendant did intentionally or knowingly inflict physical injury upon a child or having the care or custody of such child, intentionally or knowingly cause or permit another to inflict physical injury upon a child.

COUNT 3

PROVIDING PEACE OFFICER FALSE PERSONAL INFO, 76-8-507(2A)+(3A), a Class C Misdemeanor, as follows: That on or about February 21, 2025 in Salt Lake County, the defendant did with the intent of misleading a peace officer as to the defendant's identity, birth date, or place of residence, gave a false name, birth date, or address to a peace officer in the lawful discharge of the peace officer's official duties.

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

Gabriel Adams, Lukas Lockwood, Bradley Gardner, Anthony Keirnes, Hunter Williams, Eric Henry, Amanda Capps, Taylor Bateman, Kierra Olschewski, Brett Tait, Cody Aoki, Elizabeth L Bennett, Michael Melycher, Michael Lervold, Landon Gates, Evan Raye, Miles Lelevier, Dallan Starr, Brianne Holt, Andrew Sylleloglou, Cayden Torgerson, Erik Stevens, Alan Greenwood, Kaileigh Archer, Amy Olsen, N.C., D.D., and J.J.

#### DECLARATION OF PROBABLE CAUSE:

The statement of Detective Olsen of the Salt Lake City Police Department that on or about February 21, 2025, she investigated a child abduction in Salt Lake County. DCFS Case Worker, D.D. reported a hearing was held on February 21, 2025, in Third District Juvenile Court under Court case number 1248815, regarding one-year-old J.J. and her mother, defendant HOLLY SMITH. During the hearing, the Judge ordered J.J. into State custody. D.D. said following the Court ruling, SMITH fled the courthouse with J.J. D.D. said she responded to SMITH's last known residence with a Court order to take custody of J.J.; however, she received no response from the home and could not locate the child. D.D. said she contacted N.C., whose residence was listed on the safety plan in place. N.C. said that SMITH was observed getting into a vehicle earlier that morning with defendants JOEY JIMENEZ and ERIC JIMENEZ. N.C. provided text messages between herself and J. JIMENEZ. In the messages, J. JIMENEZ asked N.C. for money so he could get E. JIMENEZ, SMITH, and J.J. a room to hide out at. N.C. notified him of police involvement and encouraged him to surrender the baby.

Officer Torgerson of the Salt Lake City Police Department reported that they responded with DCFS worker D.D. to SMITH's last known address. It was reported that SMITH became upset with the Court's decision to remove the child and left. SMITH returned to her residence and then absconded with J.J. Officer Torgerson spoke with E. JIMENEZ, who reported that he had not seen SMITH or J.J. and had nothing to say. E. JIMENEZ was taken into custody for obstructing the investigation.

Officer Torgerson then spoke with J. JIMENEZ, who stated he transported SMITH and J.J. to another location near 1300 South at the Jordan River Trail. J. JIMENEZ provided access to his phone, which showed multiple text messages and phone calls about where to hide SMITH and J.J. J. JIMENEZ was taken into custody for impeding the investigation into the whereabouts of SMITH and J.J. After J. JIMENEZ was placed in handcuffs, he told Officer Torgerson that he dropped off SMITH and J.J. near 1700 South and the Jordan River Trail. J. JIMENEZ provided a phone number for SMITH, and Officer Olschewski activated an exigency ping.

While Officers Olschewski and Torgerson were on scene, they received information from Officer Aoki regarding the biological father, defendant JOSE ROBLES-PRIETO.

Officer Henry spoke with D.G. and A.P., who reported that ROBLES-PRIETO lives in one of their trailers, and they are his landlord. D.G. stated he was with ROBLES-PRIETO when the Amber alert was issued, and he was given a ride to the area of 1700 S and the Jordan River Trail. While Officers Henry and Aoki were waiting on D.G. and A.P. to check a residence they own, D.G. reported to Officer Aoki that they could see ROBLES-PRIETO and SMITH walking east on 1300 S from Redwood Road and SMITH had a blanket over her head.

Officer Lelevier was conducting searches for SMITH and J.J. when information was received that SMITH was observed walking north on Redwood Road wrapped in a white blanket. While driving north on Redwood Road, Officer Lelevier observed two individuals. One was wrapped in a white blanket, and the other was pushing a shopping cart. The male and female were contacted. The male was identified as ROBLES-PRIETO, and the female identified herself as Emily Marie Sullivan.

Sullivan reported she was from Denver, CO. Officer Lelevier conducted a records search on SMITH's tattoos, which would allow her to be positively identified, and the search revealed SMITH had a tattoo of "SF" on her left hand and a faded tattoo on her left wrist. Officer Lelevier again contacted Sullivan and ordered her to show her hands. An "SF" tattoo and a faded tattoo were observed on her left hand, and Sullivan was determined to be SMITH. Officer Lelevier spoke with ROBLES-PRIETO and asked what the female's name was, but he failed to identify her, stating that he "barely knew her" and didn't know her name.

Officer Lelevier then contacted SMITH and placed her in handcuffs. SMITH then told officers, "She's right there, she's in there," while nodding toward the shopping cart. She then stated, "I did not kidnap my daughter. I never kidnapped her." Officer Rodriguez removed the blankets from the cart and located J.J., who was pale and appeared to be cold.

Officer Bennett observed J.J. to be wearing a thin t-shirt and pants; she was soaked in urine, her hair was knotted and matted, and she smelt like cigarettes and "burnt heroin." J.J. was also observed to have dirt on her feet, hands, face, arms, and abdomen, and she was not wearing a diaper. It was also noted that the outside temperature was 24-26 degrees. J.J. also had an apparent bruise on her right leg.

Detectives Silva and Olsen interviewed ROBLES-PRIETO. Post-Miranda, he reported that J.J. is his daughter, and earlier that day, he was in the area of 1700 S when he observed SMITH in a tent cutting a white shirt to make a diaper for J.J, though he did not see J.J. at this time. ROBLES-PRIETO said later that same day, he was made aware of the Amber alert by D.G., who drove him back to the area where SMITH was last seen. ROBLES-PRIETO said he located SMITH and, this time, saw J.J. ROBLES-PRIETO said SMITH told him about being at Court earlier that day and said "they were sending (J.J.) away. SMITH told him that she fled the courthouse, picked up J.J. from a friend, and then did not return home. ROBLES-PRIETO said he invited SMITH and J.J. to stay with him "until they figured out their next steps," then placed J.J. in a shopping cart as they made their way back to his home. ROBLES-PRIETO said while on their way, police found them. When police asked him if he knew SMITH, he lied and said he did not know her. ROBLES-PRIETO stated SMITH identified herself with a name he did not recognize. He then told Officers that J.J. was inside the shopping cart. ROBLES-PRIETO confirmed he received the Amber alert on his phone and that he knew it was an emergency that indicated a child had been abducted. ROBLES-PRIETO also said that he did not attempt to notify police that he knew where SMITH and J.J. were.

Detectives Tait and Olsen spoke with J. JIMENEZ. Post-Miranda he stated he picked SMITH up and drove her to her scheduled court hearing. SMITH did not want to go; however, he encouraged her to do the right thing. SMITH asked him to watch J.J. while she was at Court, to which he agreed. JIMENEZ said he gave SMITH his cell phone so she could call after the hearing. JIMENEZ said later that day, he received a call from his sister, N.C., who told him that SMITH "just took off from court." SMITH called and spoke to E. JIMENEZ, who requested JIMENEZ take him to pick up SMITH at North Temple, which was the location she gave E. JIMENEZ. JIMENEZ said he responded to the area and picked up SMITH. She asked to be driven to 800 South and 900 West, which he did. JIMENEZ said SMITH got out of the truck and went into the store. When she returned, she asked JIMENEZ to take her to 1700 South, which he did. JIMENEZ said when they arrived, SMITH got out of the car, grabbed J.J., and left. JIMENEZ said when he returned home,

there was a police presence, and he was informed of the kidnapping. JIMENEZ said after he dropped them off, he didn't know where she went and was unsure of her whereabouts.

Detectives Tait and Olsen spoke with SMITH. They attempted to read SMITH her Miranda rights and SMITH interrupted them, stating "I know, I know because I abducted my child...", "Yes, I fucking didn't wanna surrender them to her, but literally and legally they never fucking gave me any type of verbal fucking order to fucking surrender her because I left the court...", "I'm sure they probably would've if I would've stayed in there, said I had to surrender my child." When Detective Olsen asked SMITH to listen to her so she could explain her rights, SMITH responded, "I don't want to fucking listen to your Miranda rights bullshit. I don't care." SMITH then told Detective Olsen to read her rights but said she didn't care because they would use the information provided to prosecute her. SMITH then said she "never abducted her child but fleeing criminal persecution or just, maybe I did that..." "I'm not proud of fucking pushing my daughter down the street in a shopping cart to get to point A to point B because I had to hide after court all day long because I knew they were gonna fucking pull some bullshit and try to put an Amber alert out."

NOTICE IS GIVEN pursuant to Utah Code Annotated §76-3-203.1, that the defendant is subject to an enhanced penalty as provided in that section because the above offense was committed in concert with two or more persons.

#### REQUEST FOR ISSUANCE OF A NO BAIL WARRANT:

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, was ordered by this Court to surrender her one-year-old daughter after having her parental rights terminated. The defendant intentionally took her daughter and went on the run, actively evading the police and hiding from them, using her friends to assist her. The defendant then, to continue hiding, provided law enforcement with a fake name and date of birth while concealing the victim in a shopping cart under mounds of blankets.

The victim was located filthy, not dressed appropriately for the frigid temperatures, and soaked in urine. On July 15, 2024, the defendant was placed on probation in the Third District Court under Court case number 231911207, supervised by Salt Lake Co Probation Service. On August 15, 2024, a warrant was issued for the defendant's arrest for failing to initiate probation as ordered by the Court. An Order to Show Cause was scheduled for September 23, 2024, which the defendant failed to appear at. The previously ordered warrant remained in place until the defendant was arrested.

Additionally, the defendant has an extensive criminal history out of California and has shown, by her own actions, that she should be considered a flight risk. Based on the serious nature of the allegations and the defendant's calculated actions, the State requests the defendant be held in custody without bail.

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: 26th day of February, 2025

/s/ AMY OLSEN  
Declarant

Subscribed and sworn to before me this 26th day of February, 2025

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Samuel Comi  
Deputy District Attorney  
26th day of February, 2025  
SC / JO / DAO # 25.003377

**OTHER PENDING CASES FOR THE DEFENDANT**

<b>Court</b>	<b>Court Case #</b>	<b>Trial Judge</b>	<b>DAO #</b>	<b>Charge</b>
Third District Court, SALT LAKE DEPARTMENT	231911207	Parker, Paul B	23.021224	No active charges