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

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THE STATE OF UTAH,  
  
Plaintiff,

vs.

**JACOB HOLT JOHNSON,**  
**DOB: 09/06/1984**  
**13364 S Stone Hayes Ct**  
**Herriman, UT 84096**  
**OTN#: 68155464**  
**SO#: 287377**  
**SID#/BCI#: 1047476**  
**Booking#: 24060293**

Defendant.

Screened by: HOMICIDE TEAM  
Assigned to: TO BE ASSIGNED

**DOMESTIC VIOLENCE  
INFORMATION**

DAO # 25.000138

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: IN JAIL PRD  
01/10/2025

Case No.

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The undersigned Detective S. Peterson - Herriman Police Department, Agency Case No. HR24-25515, upon a written declaration states on information and belief that the defendant, JACOB HOLT JOHNSON, committed the crime(s) of:

COUNT 1

AGGRAVATED MURDER (DV), 76-5-202, a First Degree Felony, as follows: That on or about December 30, 2024, in Salt Lake County, the defendant did intentionally or knowingly cause the death of another under any of the following circumstances: the actor was previously convicted of aggravated robbery, Section 76-6-302 and The homicide was committed in an especially heinous, atrocious, cruel, or exceptionally depraved manner, any of which must be demonstrated by physical torture, serious physical abuse, or serious bodily injury of the victim before death. Furthermore, the defendant was a cohabitant of the victim.

COUNT 2

OBSTRUCTION OF JUSTICE - CAPITAL/FIRST DEGREE FELONY CONDUCT, 76-8-306(2)+(3A), a Second Degree Felony, as follows: That on or about December 30, 2024, in Salt Lake County, 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.

To wit: clean up

COUNT 3

PURCHASE, TRANSFER, POSSESSION OR USE OF A DANGEROUS WEAPON BY RESTRICTED PERSON, 76-10-503(2)(B), a Third Degree Felony, as follows: That on or about December 30, 2024, in Salt Lake County, the defendant did (2) being then a Category I restricted person, intentionally or knowingly agree, consent, offer, or arrange to purchase, transfer, possess, use, or have under the person's custody or control, or intentionally or knowingly purchased, transferred, possessed, used, or had under the person's custody or control:

(b) any dangerous weapon other than a firearm.

To wit: hammer

COUNT 4

ABUSE OR DESECRATION OF A HUMAN BODY, 76-9-704, a Third Degree Felony, as follows: That on or about December 30, 2024, in Salt Lake County, the defendant did intentionally and unlawfully disturb, move, remove, conceal, or destroy a dead human body or any part of it.

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

Officer Steggell, Detective T. Robertson, Detective B. Barrett, Detective S. Peterson, Officer Q. Schromeges, T.S., J.S., N.M., L.S., and Dr. Murie

DECLARATION OF PROBABLE CAUSE:

Your affiant bases probable cause on information and evidence collected by Herriman Police Department, Case No. HR24-25515 and the following:

The statement of Bluffdale Police Officer Steggell that in the early hours of December 31, 2024, in Salt Lake County, he observed a white Jeep Compass in the 7-11 parking lot parked at an angle across multiple parking spaces. Officer Steggell observed an unconscious male in the driver seat of the vehicle. Officer Steggell began tapping on the window to wake up the male. The driver was identified as JACOB HOLT JOHNSON. Officer Steggell noted that JOHNSON had slow delayed speech, his movements were slow and delayed, and he was nodding off in the driver's seat. Officers assisting Officer Steggell viewed into the rear compartment of the vehicle from the rear window and observed a female in a cardboard box. Officers opened the trunk to check on the welfare of the female and found that the female had an extension cord around her neck and multiple

bruises and lacerations to her head, arms, and legs. The female was unresponsive and cold to the touch. The female was identified as S.M.

The statement of Bluffdale Police Detective T. Robertson that he observed, in plain view, a steel hammer with a light-colored wooden handle with what appeared to be blood on the face of the head of the hammer on the passenger seat. A large fixed-blade knife with at least an 8" blade was between the passenger seat the center console. A red gas can was on the passenger floor, and under the case was a Clorox bleach bottle. The closed top of the large cardboard box was just behind the passenger seat. On the lid of the cardboard box were several blood stains and prints. It was then determined that the death had occurred within the boundaries of Herriman City.

Detective Robertson noted that S.M.'s body was curled up with signs of rigor. She was on her back with knees drawn up to her chest and arms curled in. S.M. only had underwear on. S.M.'s body was covered in a large number of bruises and dried blood. S.M.'s hair was matted in blood as well, and she had an orange extension cord and clear packaging tape wrapped around her neck. The cardboard box that contained S.M.'s body also had several paper towels with blood, a black trash bag with unknown items in it, and a clear scotch tape roll. The top interior of the box had a large bloodstain consistent with something being dragged along the box.

The statement of Herriman Police Detective B. Barrett, that an approved search warrant was served on JOHNSON's residence, located at 13364 South Stone Hayes Court, in Salt Lake County. During the search, Detectives located blood on the bottom sheet of the master bed, blood was located at the top of the landing on the pony wall, kitchen window blinds were found with blood splatter, blood was found on kitchen counter glass, hair was located inside the kitchen sink, and a bat was found on the kitchen floor that had smudge marks that made it appear as if it had recently been washed. Detective located blood on the paper towel roll, smudge marks were observed on the kitchen floor that appeared to be left from something being dragged from the entrance to the basement towards the garage door, and blood traces were located in multiple areas on the stairwell including the wall, baseboards, and stair posts. There was blood located on the carpet of the stairs. In the basement, a cushion cover was found at the bottom of the stairs with blood on it, a mattress cover was found in the basement with traces of blood, and a zip jacket was located on the floor of the basement with blood on it. A piece of carpet with blood stains was cut out and seized. In the garage, the pole of a push broom was located in the track of the garage door that kept the door from being opened. Detectives removed the pole and lifted the garage door. Detectives located a mattress in the garage wrapped in plastic with blood stains, as well as a paper towel with hair and what appeared to be a small piece of skin. An empty Clorox bleach bottle was located on top of the mattress in the garage, and white, blue, and orange Jordan shoes were located in the garage with blood stains on them. Two large black trash bags were located with multiple items inside that had blood stains, to include a karaoke machine, lamp shade, and a body weight swing. Also inside the trash bags were multiple towels that were beginning to crust and appeared to have bleach stains.

Detectives observed a strong odor of bleach/chlorine inside the kitchen, garage, and basement. Underneath the piece of carpet removed by evidence technicians, the odor of bleach was strong and the floor was slightly damp.

Once the search of the residence was complete, several detectives and the evidence technicians went into the basement and applied a chemical called Blue Star to the carpet. Once the chemical was applied it glowed with a bright blue color indicating the presence of blood or a cleaning agent. The chemical glowed on the stairs, handrail leading into the basement, kitchen floor, kitchen cabinets, and kitchen sink.

A search of JOHNSON's vehicle yielded the box S.M. was located in, a hammer on the front seat with blood, and multiple items of clothing. A Spiderman backpack was located that contained S.M.'s Utah ID card. Detectives found a roll of clear packaging tape, two empty Clorox bleach bottles, and S.M.'s white croc shoes. Detectives also located several long fix bladed knives and hatchets inside the vehicle. In the cargo area of the vehicle was a long carboard box that was open on both ends. Inside the box was a black trash bag with items inside that included bloody paper towels. Detectives located clothing inside the vehicle, namely a gray with black dots footie style pajamas that appeared to have been cut long ways up the garment. A men's long sleeve shirt and a pair of men's pants were located. The men's clothing was wet and appeared to have residual blood staining.

The statement of Herriman Police Department Detective S. Peterson that video surveillance was obtained from multiple neighbors around JOHNSON's home. On Monday, December 30, 2024, at 2:06 pm, JOHNSON can be seen at his car in the driveway trying to organize the rear trunk area. At 2:22 pm, JOHNSON's car was backed into the driveway, the garage door was open, and JOHNSON is attempting to close the lift gate to his car. JOHNSON is able to get the lift gate most of the way closed but is unable to get it to latch closed. JOHNSON is seen wearing dark gray pants, light gray shoes, a light gray or white hoodie with camouflaged hood and sleeves, which happened to be what he was wearing at the time of his arrest.

The statement of Herriman Police Officer Q. Schromeges that he reviewed video surveillance from 7-11 and observed JOHNSON arrive at 2155 hours on December 30, 2024. JOHNSON entered that store, bought a couple of things, and returned to his vehicle. The vehicle sits in the parking lot for a couple of minutes and appears to move slightly and shuts off. The vehicle remains in place for quite some time, and it appears to move a couple of feet from the original parking place and shuts off. Around 0010 hours on December 31, 2024, Officers make contact with JOHNSON as his vehicle was parked oddly in the stalls.

The statement of T.S. and J.S. that S.M. moved into their basement beginning of November 2024. T.S. stated that JOHNSON had helped S.M. move into their home. T.S. stated that he often provided S.M. with rides to and from work, as they did not want her walking alone at night. On Friday before the incident, S.M. told T.S. and J.S. that JOHNSON had gotten them a hotel room downtown and S.M. was looking forward to it. S.M. had told T.S. that JOHNSON was going to pick her up from work the night of Saturday, December 28, 2024, and that she would not be coming home after work. This is the last T.S. and J.S. heard from S.M. T.S. stated that S.M. and JOHNSON had an on-and-off again relationship over the past four years and described JOHNSON has a hothead. T.S. and J.S. described S.M. as a kind and uplifting girl who had a difficult childhood and learning disabilities. They estimated her mental function to be around the age of 16, despite her being 30 years old. They also stated that S.M. lacked basic life skills and they taught her how to cook eggs and encouraged her to get her driver's license.

The statement of N.M. that he worked very close with S.M. over the past 4 months. N.M. stated that back in October 2024, S.M. asked him for a ride to work, which was unusual, but he wanted to help her, so he picked her up at her apartment on Redwood Road. N.M. stated that on the drive to work, S.M. confided in him that she was having trouble with JOHNSON and described JOHNSON as verbally abusive and mentioned that he had hit her multiple times. S.M. had told JOHNSON to leave her apartment, but he continued to harass her through texts and calls. N.M. stated that he had picked S.M. up a few days later and she told N.M. that JOHNSON was still verbally abusing her and threatening to find her. After these incidents, S.M. did not talk much about JOHNSON, as they had broken up and S.M. seemed to have moved on. N.M. stated that on Saturday before New Year's, S.M. texted him to tell him that she would be late for work, which was not unusual as she was often late once a week by 15 or 20 minutes. However, this time S.M. was over two hours late, and her phone went straight to voicemail when N.M. tried to call her. When S.M. got to work, she seemed off and mentioned she didn't have her phone. N.M. stated that on Monday, December 30, 2024, Summer did not show up for work and he later learned that Summer had died.

The statement of L.S. that she is a close friend of S.M.'s. L.S. stated that on November 25, 2024, she took S.M. out for her birthday. During the drive, S.M. told L.S. that JOHNSON had recently put her in a chokehold nearly killing her. L.S. stated that S.M. demonstrated it to her and made a triangle choke motion with her left arm, sticking her arm out to the side, and pulling her own wrist back towards her chest. L.S. stated that S.M. frequently spoke about the abuse she endured from JOHNSON, including physical fights and emotional distress.

Dr. Murie with the Utah State Office of the Medical Examiner conducted an autopsy of S.M. S.M.'s entire body was covered in bruises with chunks of skin missing from her knees and other areas of her body. S.M. had several marks and open wounds caused by a claw hammer, including several to her face and head. Dr. Murie reported injuries included a ruptured and hemorrhaged liver, hemorrhaged lungs, hemorrhaged heart, hemorrhaged carotid arteries, broken ribs, possible brain bleed, and a fractured hyoid bone. Dr. Murie noted that the trauma suffered by S.M. was extreme, and the likely cause of death is the totality of injuries from blunt force trauma.

NOTICE IS HEREBY GIVEN the defendant has previously been convicted of Aggravated Robbery in Fourth District Court, case number 041400809.

NOTICE OF HEREBY GIVEN, that the defendant is a Category I restricted person as he has previously been convicted of Aggravated Robbery in Fourth District Court, case number 041400809.

MOTION FOR NO BAIL HOLD:

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

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

In this case, the defendant and the victim were in an on-and-off again intimate relationship for four years. The defendant and victim met up after the defendant was released from rehab. During the investigation, Detectives learned that the defendant was seen the day of the incident cleaning out the back of his car. About 10 minutes later, he had his car backed in the driveway and was trying to shut the back of his vehicle but was struggling. Later that night, the defendant is seen on video surveillance going to the 7-11 about 9:55 pm where he remained until law enforcement made contact with him. Officers then located the victim deceased in a box in the back of the defendant's car.

Detectives learned that the victim suffered physical and emotional abuse at the hand of the defendant, including the defendant choking the victim. The defendant harassed the victim with phone calls and texts, threatening her. On the day of the incident, the defendant became upset, and a physical altercation occurred. The medical examiner noted severe injuries that resulted in the victim's death.

Due to the serious nature of the allegations, the defendant's prior felony conviction, the especially heinous and cruel manner in which the victim's body was found, the serious bodily injuries the victim sustained, and the extent the defendant went to clean up the scene, the defendant should be held 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: 9th day of January, 2025.

/s/ STEVE PETERSON

Declarant

Authorized for presentment and filing:

SIM GILL, District Attorney

/s/ Ryan Hansen

Deputy District Attorney

10th day of January, 2025

RH / MM / DAO # 25.000138

**OTHER PENDING CASES FOR THE DEFENDANT**

Court	Court Case #	Trial Judge	DAO #	Charge
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