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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.

JOEY FREDERICK JIMENEZ
DOB: 05/26/1983
AKA: Bundy; Joey Fredrick Jimenez
314 South Post Street
Salt Lake City, UT 84104
OTN#: 68199397
SO#: 270117
SID#/BCI#: 1021560
Booking#: 25008782

Defendant.

JIMENEZ, ERIC
DOB: 11/18/1987
ROBLES-PRIETO, JOSE FRANCISCO
DOB: 10/03/1977
SMITH, HOLLY
DOB: 07/18/1992
Co-Defendant(s)

Screened by: SAMUEL COMI
Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 25.003387

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: PTB

Case No.

Co-Defendant DAO# 25.003389

Co-Defendant DAO# 25.003382

Co-Defendant DAO# 25.003377

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, JOEY FREDERICK JIMENEZ, 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.

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

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

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 FREDERICK 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 FRANCISCO 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. had an apparent bruise on her right leg and redness on her stomach.

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.

NOTICE IS GIVEN that the defendant has pending felony matters in the Third District Court under Court cases 241911305 and 241900028. These matters are set for a Hearing on March 6, 2025, before Judge Hruby-Mills.

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:

1. The defendant is charged with a felony and there is substantial evidence supporting the charge and clear and convincing evidence that the defendant would constitute a substantial danger to any other individual or to the community, or is likely to flee the jurisdiction of the court, if released on bail; and
2. The defendant is charged with a felony and there is substantial evidence to support the charge and clear and convincing evidence that the defendant violated a material condition of release while previously on bail;

The defendant, upon finding out that the victim's mother lost custody of her child, sought out money to hide the victim in a hotel room in a neighboring city despite being urged by a family member to turn the child over to the case worker.

The defendant then took SMITH to multiple locations and dropped her and the child off. The defendant evaded police questioning and lied about the victim's whereabouts and his knowledge of where she was.

The defendant obstructed the investigation by not providing information upfront, which could have led to locating the victim sooner. It wasn't until the defendant was in custody that he provided information to law enforcement officers and assisted them.

The defendant was on bond in two felony matters, 241911305 and 24190023, at the time of this offense with an upcoming scheduled court appearance.

The defendant has an extensive criminal history dating back to 2003 and is charged with multiple felonies in this matter.

The defendant was arrested in this matter on February 21, 2025, for Obstruction of Justice, a Second Degree felony, and released to Pre-Trial services after posting bond. Based on the elevated first-degree felony charge, the State requests a no-bail warrant in this matter.

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 / NH / DAO # 25.003387

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
SL	171912195	HRUBY-MILLS	17028151	Theft<500-B_F3
Third District Court, SALT LAKE DEPARTMENT	241900028	STORMONT, CHARLES, Hrubby- Mills, Elizabeth A	23.024374	Count 1 58-37-8(2)(B)(II) POSSESSION OF A CONTROLLED SU... (Third Degree Felony) Count 2 58-37A-5(1)(A) POSSESSION OF DRUG PARAPHERNALIA (Class B Misdemeanor)
Third District Court, SALT LAKE DEPARTMENT	241911305	Hruby-Mills, Elizabeth A	24.016457	Count 1 76-6-408(2)+(3AI) THEFT BY RECEIVING STOLEN PRO... (Second Degree Felony)
Third District Court, SALT LAKE DEPARTMENT	201900517	Hruby-Mills, Elizabeth A	24.005383	No active charges
Third District Court, SALT LAKE DEPARTMENT	251902450	Parker, Paul B	25.003377	Count 1 76-5-301.1 CHILD KIDNAPPING (First Degree Felony) Count 3 76-8-507(2A)+(3A) PROVIDING PEACE OFFICER FALSE... (Class C Misdemeanor) Count 2 76-5-109(2)+(3A) CHILD ABUSE - INTENTIONALLY O... (Class A Misdemeanor)
Third District Court, SALT LAKE DEPARTMENT	231911207	Parker, Paul B	23.021224	No active charges
Third District Court, SALT LAKE DEPARTMENT	221910470	Parker, Paul B	22.009694	No active charges