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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.

THOMAS JIM LONG,
DOB: 10/12/1979
AKA: Thomas J Long
144 E Garden Park Cir
Salt Lake City, UT 84115
OTN#: 68087659
SO#: 389181
SID#/BCI#: 389181
Booking#: 24046522

Defendant.

Screened by: HOMICIDE TEAM
Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 24.018446

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: IN JAIL PRD
10/17/2024

Case No.

The undersigned Agent. B. Hansen - State Bureau of Investigations and Utah Highway Patrol, Agency Case Nos. 232400457 and 042407402, upon a written declaration states on information and belief that the defendant, THOMAS JIM LONG, committed the crime(s) of:

COUNT 1

MURDER, 76-5-203, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did intentionally or knowingly cause the death of another; intending to cause serious bodily injury to another, commit an act clearly dangerous to human life that caused the death of another; acting under circumstances evidencing a depraved indifference to human life, knowingly engage in conduct which created a grave risk of death to another and thereby caused the death of another; engage in the commission, attempted commission, or immediate flight from the commission or attempted

commission of any predicate offense, to wit: Felony Discharge of a Firearm or was a party to the predicate offense; and a person other than a party as defined in Utah Code Section 76-2-202 was killed in the course of the commission, attempted commission, or immediate flight from the commission or attempted commission of any predicate offense.

COUNT 2

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 3

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 4

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 5

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 6

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 7

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 8

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 9

FELONY DISCHARGE OF A FIREARM WITH SERIOUS BODILY INJURY, 76-10-508.1, a First Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

Furthermore, the aforementioned violation caused serious bodily injury to any person.

COUNT 10

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

COUNT 11

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows: That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;

(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or

(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

COUNT 12

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows:
That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;
(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or
(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

COUNT 13

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows:
That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;
(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or
(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

COUNT 14

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows:
That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;
(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or
(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

COUNT 15

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows:
That on or about October 7, 2024, at SR 201 Eastbound near 1000 West, in Salt Lake County, the defendant did knowingly or having reason to believe that any person may be endangered by the discharge of a firearm, discharged a firearm in the direction of any person or persons;
(b) with the intent to intimidate or harass another or with intent to damage a habitable structure, discharged a firearm in the direction of any person or habitable structure; or
(c) with the intent to intimidate or harass another, discharged a firearm in the direction of any vehicle.

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

Agent B. Hansen, J.T., and Medical Examiner's Office

DECLARATION OF PROBABLE CAUSE:

Your affiant bases probable cause on information and evidence collected by State Bureau of Investigations and Utah Highway Patrol, Case Nos.232400457 and 042407402 and the following:

The statement of State Bureau of Investigations Agent B. Hansen that on October 7, 2024, he responded to a road rage altercation that ended in a vehicle crash at SR 201 Eastbound near 1000 West, in Salt Lake County. Agent Hansen observed a black Dodge Ram pick up that had crashed into the concrete barrier perpendicular to the lanes. Behind the Dodge Ram, was evidence of burned rubber across the lanes of traffic. A gray Ford Explorer was positioned to the left of the Dodge Ram, also facing the concrete barrier parallel to the Dodge Ram. The Ford Explorer had visible damage on the passenger side. The passenger window of the Ford Explorer was up. Agents located 15 shell casings between the passenger side of the Ford Explorer and the driver's side of the Dodge Ram. Bullet holes were also located in the passenger side window of the Dodge Ram with an outward direction. There was a deceased male in the driver's seat of the Dodge Ram with his seatbelt still on, later identified as J.R., and had sustained multiple fatal gunshot wounds. Agent Hansen located a firearm in a bag on the passenger side of the Ford Explorer. The driver of the Ford Explorer was identified as THOMAS JIM LONG.

Agents obtained dash cam video from witness J.T. The footage shows LONG who was identified as the driver of the gray Ford Explorer traveling eastbound on SR 201 in lane 2. At the merge from southbound I-215 a Black Ram Pickup identified as driven by J.R. merges across 2 lanes of travel in front of LONG. LONG brakes and moves into lane 1 with a short signal. LONG then accelerates passing J.R. pulling in front of him without signaling and brakes hard. J.R. brakes and changes lanes into lane 3. J.R. shortly after signals to move back into lane 2 behind LONG. As J.R. changes lanes, LONG once again brakes hard in front of J.R. causing him to quickly brake. J.R. continues to follow LONG. LONG brakes hard another time and J.R. changes into lane 1 accelerates and swerves into lane 2 toward LONG's vehicle. LONG moves into lane 3 and J.R. continues to swerve at LONG's vehicle. LONG accelerates and stays in lane 3. J.R. accelerates and swerves at LONG. LONG brakes hard and changes lanes behind J.R. placing J.R. in lane 3 and LONG in lane 2. J.R. signals to the exit and moves over to the far-right lane. J.R. keeps his right turn signal on and moves to the left crashing into LONG. LONG's vehicle then swerves to the right in front of J.R. causing both vehicles to go to the concrete barrier on the south side of SR 201.

Agents obtained surveillance footage from UTA that shows the vehicles stop on SR 201 at Exit 17 on the shoulder perpendicular to the concrete barrier. Shortly after the crash, smoke can be seen coming up from the rear tires of the Dodge Ram driven by J.R.

Agents obtained the 911 recording made to dispatch by LONG. During the call, LONG tells dispatch, this "Guy just fucking ran me off the road, he hit me fucking several times, threatened my life. He fucking uh. I'm scared as fuck, I don't know what the fuck to do." LONG then said, "He crashed into me a couple times." When dispatch asked, "Are you guys injured?" LONG replies, "Uh he is." And "Um a lot." LONG then laughs. When dispatch asked where the other guy was injured, LONG replied, "Uh I'm not even going near him." LONG then bursts out saying, "Listen this guy threatened my fucking life and I'm scared as shit he pulled something from his fucking waistband so I shot him. " Dispatch replied, "You shot him?" LONG replies, "Well this mother fucker was threatening my life he was telling me he was gonna kill me." Dispatch said, "I understand that but I need to know where did you shoot him?" LONG said, "I don't remember

During an autopsy at the State Office of the Medical Examiner's office, eight bullets were recovered from the J.R.'s body: two near the left shoulder area, one near the left clavicle, two to the left side of his head, one near his jaw, and two to his neck. J.R. exhibited stippling, or small burns and abrasions on this face, which are indicative of the weapon being fired from no further than three feet. No weapons were located on J.R.'s person.

Agents noted that the location of the casings in between both vehicles, evidence of stippling to J.R.'s face, and the lack of any bullet impacts through LONG's passenger side window as strongly indicative that LONG exited his vehicle and fired 15 rounds near the head and upper body area of J.R. from a close range as J.R. remained seated with his seatbelt on. Agents also noted that there were no weapons on J.R.'s person in contradiction of LONG's statement that J.R. was "reaching for something."

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 charges 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 was driving eastbound at SR 201 when the victim merged on SR 201 from I-215. The dashcam video clearly demonstrated that the defendant instigated the driving pattern described above. As the victim was merging, with this signal on in front of the defendant, the defendant needlessly accelerated around the victim, pulled in front of the victim and braked checked him. The victim initially changed lanes, but then moved back over behind the defendant. The defendant then brake checked the victim again. The victim and the defendant then proceeded to accelerate, swerve at each other, and hit their vehicles into each other. The defendant then swerved to the right in front of the victim causing both vehicles to go into the concrete barrier. During a 911 call, the defendant admitted to shooting the victim. During the investigation, Agents located 15 shell casings and during the autopsy, 8 bullets were recovered from the victim.

The defendant made a conscious decision to escalate a simple traffic situation. The defendant then exited his vehicle, went around to his passenger side, and fired 15 rounds at close range into the victim, who was unarmed. The defendant is a danger to the community and based upon the serious nature of the allegations, he 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: 17th day of October, 2024.

/s/ Brian Hansen

Declarant

Authorized for presentment and filing:

SIM GILL, District Attorney

/s/ Morgan Vedejs

Deputy District Attorney

17th day of October, 2024

MV / MM / DAO # 24.018446

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
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