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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.

OLUWATOBI OLUDAISI SHOKUNBI

DOB: 02/02/1990

AKA: Oluwatobi Shokunbi

Address: Unknown

OTN#:

SO#: 450225

SID#/BCI#: 1387588

Booking#:

Defendant.

Screened by: HEATHER LINDSAY

Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 24.016631

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: NOT BOOKED

Case No.

The undersigned Police Officer Nichole Jones - Salt Lake City Police Department, Agency Case No. 24-214963, upon a written declaration states on information and belief that the defendant, OLUWATOBI OLUDAISI SHOKUNBI, committed the crime(s) of:

COUNT 1

STALKING, 76-5-106.5(2)+(3AI), a Class A Misdemeanor, as follows: That on or about September 4, 2024, through September 14, 2024, at 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.

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

Alan Jurmu, Nichole Jones and Alayna Stoddard.

DECLARATION OF PROBABLE CAUSE:

Your Declarant bases the Information upon the following:

The statement of Salt Lake City Police Officer that he investigated multiple reports that OLUWATOBI OLUDAISI SHOKUNBI was stalking A.S. in September 2024 in Salt Lake County. A.S. reported that the defendant's behavior has caused her to fear for safety. The defendant's conduct is as follows:

1. On or about September 4, 2024, SHOKUNBI entered A.S. residence and began rummaging around. A.S. roommate A.R. confronted SHOKUNBI asking what he wanted. SHOKUNBI said he was looking for someone, then asked for A.S. by name. A.R. told SHOKUNBI to leave, and he left the residence. A.R. provided officers with surveillance video of the incident. A.S. told officers that she did not know who SHOKUNBI was, that they had never met before, and that they had no prior relationship in anyway.
2. On or about September 11, 2024, SHOKUNBI approached A.S. at a Trax station. A.S. recognized SHOKUNBI from the September 4, 2024, incident. A.S. stated that she was unsettled and believed that SHOKUNBI had been following her.
3. On or about September 14, 2024, SHOKUNBI entered a residence hall on the University of Utah campus where A.S. was working on a project. A.S. recognized SHOKUNBI from the September 4 and September 11, 2024, incidents. SHOKUNBI was escorted from the residence hall by University of Utah police officers.

NO BAIL WARRANT REQUEST:

Pursuant to Utah Code 77-20-201(1) the State requests that Defendant be held without bail until further notice in this matter because the defendant is charged with a Stalking Class A Misdemeanor and there is substantial evidence supporting the charge and clear and convincing evidence that the defendant would constitute a substantial danger to the victim or to the community, if released on bail.

As referenced in the probable cause statement in this Information, there is substantial evidence based on the victim's statement that the Defendant knew the victim's address, entered the victim's residence uninvited, asked for the victim by name, and began rummaging around. The victim's roommate confronted the Defendant, and he left the residence. The victim stated that she did not know the Defendant, that they did not have a prior relationship, and that they have never interacted prior to these events. The Defendant later approached the victim at a Trax station. The victim recognized the Defendant from the previous incident. The victim stated that she was unsettled and believed that the Defendant had been following her. The Defendant later gained access to a secured building at the University of Utah, where he was not allowed, where the victim was working on a project. The victim recognized the Defendant from previous incidents and the Defendant was escorted from the building by University of Utah police officers.

The Defendant has demonstrated himself to be a danger to the victim and the community by knowing the victim's address, entering the victim's residence uninvited, asking for the victim by name, and rummaging around her residence. The victim stated that she did not know the Defendant. The Defendant later approached the victim at a Trax station. The victim recognized the Defendant from the previous incident. The victim stated that she was unsettled and believed that the Defendant had been following her. The Defendant later gained access to a secured building at the University of Utah, where he was not allowed, where the victim was working on a project. The victim recognized the Defendant from previous incidents and the Defendant was escorted from the building by University of Utah police officers.

Additionally, the Defendant has a pending case with our office in DA case number 24.016039, in which the Defendant entered a different female victim's residence, entered the victim's bedroom while she was sleeping and stated, "I'm looking for a beautiful lady," the victim did not know the Defendant and told him to leave. The Defendant was later found in the community room of the victim's residence. Law enforcement reviewed video surveillance of the incident and saw the Defendant walking around the community room completely nude. An additional victim stated that he saw the Defendant's exposed genitalia. Both the victims in this case did not know the Defendant, nor did they have any kind of prior relationship with him. The Defendant has put multiple female victims in fear for their safety and security within a very short time frame, and is escalating in his behavior. All of the victims involved are young women who have been victimized in their homes or in other secured areas in which they have a right and expectation of protection. The Defendant has repeatedly violated these spaces and gives no indication that he will not continue to do so. Due to the unique and highly emotional nature of stalking, the Defendant's pending matters, and his actions in this matter, the State believes that should the Defendant remain out of custody it is likely that the victim will suffer further harm at the hands of the defendant.

REQUEST FOR ISSUANCE OF A WARRANT:

****See PC****

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: 18th day of September, 2024

/s/ NICHOLE JONES
Declarant

Subscribed and sworn to before me this 18th day of September, 2024

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Heather Lindsay
Deputy District Attorney
19th day of September, 2024
HL / GM / DAO # 24.016631

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
Third District Court, SALT LAKE DEPARTMENT			24.016039	Count 1 76-6-206(3)(A) CRIMINAL TRESPASS (DWELLING) (Class A Misdemeanor) Count 2 76-5-106.5(3)(A)(I) STALKING (Class A Misdemeanor)