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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.

RAMON ROJAS-HUERTA
DOB: 07/25/1980
3895 WEST 3200 SOUTH
West Valley City, UT 84120
SO#: 320016
SID#/BCI#: 1153265

Defendant.

Screened by: ADRIANNA DAVIS
Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 25.014035

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: NOT BOOKED

Case No.

The undersigned Detective DEREK BRUMMEL - West Jordan Police Department, Agency Case No. WJ25-31917, upon a written declaration states on information and belief that the defendant, RAMON ROJAS-HUERTA, committed the crime(s) of:

COUNT 1

ASSAULT ON PEACE OFFICER/MILITARY W/USE OF DANGEROUS WEAPON, 76-5-102.4(2)+(3CI), a Second Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did , assault a peace officer, with the knowledge that the person was a peace officer, when the peace officer was acting within the scope of his authority as a peace officer; or

(b) assault a military servicemember in uniform when that service member was on orders and acting within the scope of authority granted to the military servicemember in uniform; and

(i) a dangerous weapon.

COUNT 2

ASSAULT ON PEACE OFFICER/MILITARY W/USE OF DANGEROUS WEAPON, 76-5-102.4(2)+(3CI), a Second Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did , assault a peace officer, with the knowledge that the person was a peace officer, when the peace officer was acting within the scope of his authority as a peace officer; or

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(i) a dangerous weapon.

COUNT 3

ASSAULT ON PEACE OFFICER/MILITARY W/USE OF DANGEROUS WEAPON, 76-5-102.4(2)+(3CI), a Second Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did , assault a peace officer, with the knowledge that the person was a peace officer, when the peace officer was acting within the scope of his authority as a peace officer; or

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(i) a dangerous weapon.

COUNT 4

ASSAULT ON PEACE OFFICER/MILITARY W/USE OF DANGEROUS WEAPON, 76-5-102.4(2)+(3CI), a Second Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did , assault a peace officer, with the knowledge that the person was a peace officer, when the peace officer was acting within the scope of his authority as a peace officer; or

(b) assault a military servicemember in uniform when that service member was on orders and acting within the scope of authority granted to the military servicemember in uniform; and

(i) a dangerous weapon.

COUNT 5

ASSAULT ON PEACE OFFICER/MILITARY W/USE OF DANGEROUS WEAPON, 76-5-102.4(2)+(3CI), a Second Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did , assault a peace officer, with the knowledge that the person was a peace officer, when the peace officer was acting within the scope of his authority as a peace officer; or

(b) assault a military servicemember in uniform when that service member was on orders and acting within the scope of authority granted to the military servicemember in uniform; and

(i) a dangerous weapon.

COUNT 6

PROPERTY DAMAGE/DESTRUCTION >\$1500 < \$5000, 76-6-106.1(2B)+(3BII), a Third Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did intentionally damage, deface, or destroy the property of another and the actor's conduct caused or was intended to cause pecuniary loss equal to or in excess of \$1,500 but was less than \$5,000 in value.

COUNT 7

AGGRAVATED ASSAULT, 76-5-103(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did attempt, with unlawful force or violence, to do bodily injury to another;

(ii) make a threat, accompanied by a show of immediate force or violence, to do bodily injury to another; or

(iii) commit an act, committed with unlawful force or violence, that causes bodily injury to another or creates a substantial risk of bodily injury to another; and includes in the actor's conduct under Subsection (2)(a) the use of:

(i) (a) a dangerous weapon; or

(b) a motor vehicle;

(ii) any act that impedes the breathing or the circulation of blood of another individual by the actor's use of unlawful force or violence by:

(a) applying pressure to the neck or throat of an individual; or

(b) obstructing the nose, mouth, or airway of an individual; or

(iii) other means or force likely to produce death or serious bodily injury.

COUNT 8

AGGRAVATED ASSAULT, 76-5-103(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did attempt, with unlawful force or violence, to do bodily injury to another;

(ii) make a threat, accompanied by a show of immediate force or violence, to do bodily injury to another; or

(iii) commit an act, committed with unlawful force or violence, that causes bodily injury to another or creates a substantial risk of bodily injury to another; and includes in the actor's conduct under Subsection (2)(a) the use of:

(i) (a) a dangerous weapon; or

(b) a motor vehicle;

(ii) any act that impedes the breathing or the circulation of blood of another individual by the actor's use of unlawful force or violence by:

(a) applying pressure to the neck or throat of an individual; or

(b) obstructing the nose, mouth, or airway of an individual; or

(iii) other means or force likely to produce death or serious bodily injury.

COUNT 9

FELONY DISCHARGE OF A FIREARM, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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 10

FELONY DISCHARGE OF A FIREARM, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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

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(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, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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 16

FELONY DISCHARGE OF A FIREARM, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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 17

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(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 18

FELONY DISCHARGE OF A FIREARM, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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 19

FELONY DISCHARGE OF A FIREARM, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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 20

FELONY DISCHARGE OF A FIREARM, 76-11-210(2)+(3A), a Third Degree Felony, as follows: That on or about June 29, 2025 at 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 21

FAILURE TO RESPOND TO OFFICER'S SIGNAL TO STOP, 41-6A-210, a Third Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did after receiving a visual or audible signal from a law enforcement officer to bring the vehicle to a stop:

- (i) operated the motor vehicle in willful or wanton disregard of the signal so as to interfere with or endanger the operation of any vehicle or person; or
- (ii) attempt to flee or elude a law enforcement officer by vehicle or other means.

COUNT 22

UNLAWFUL CONTROL OF VEHICLE USED TO COMMIT FELONY, 41-1A-1314(3)(B)(II), a Third Degree Felony, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did , exercise unauthorized control over a motor vehicle that was not his own, without the consent of the owner or lawful custodian, and with the intent to temporarily deprive the owner or lawful custodian of possession of the motor vehicle, and the vehicle was used to commit a felony.

COUNT 23

DRIVING UNDER THE INFLUENCE OF ALCOHOL AND/OR DRUGS SECOND OFFENSE IN 10 YRS, 41-6A-502(1)+(2BIV), a Class A Misdemeanor, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did operate or was in actual physical control of a vehicle, and

- (a) had sufficient alcohol in his or her body that a subsequent chemical test showed that the defendant had a blood or breath alcohol concentration of .05 grams or greater at the time of the test;
- (b) was under the influence of alcohol, any drug, or the combined influence of alcohol and any drug to a degree which rendered the defendant incapable of safely operating a vehicle; or
- (c) had a blood or breath alcohol concentration of .05 grams or greater at the time of operation or actual physical control.

Furthermore this is the defendant's second offense within 10 years.

COUNT 24

PROPERTY DAMAGE/DESTRUCTION < \$500, 76-6-106.1(2B)+(3BIV), a Class B Misdemeanor, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did intentionally damage, deface, or destroy the property of another and the actor's conduct caused or was intended to cause pecuniary loss equal to or less than \$500 in value.

COUNT 25

RECKLESS DRIVING, 41-6A-528, a Class B Misdemeanor, as follows: That on or about June 29, 2025 at SALT LAKE COUNTY, the defendant did operate a vehicle:

- (2) in willful or wanton disregard for the safety of persons or property; or
- (a) while traveling on a highway at a speed of 105 miles per hour or greater; or
- (b) committing three or more moving traffic violations under Utah Code Title 41, Chapter 6a, Traffic Code, in a series of acts occurring within a single continuous period of driving covering

three miles or less in total distance.

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

LEAH CUNDIFF, BRYTON J FARNSWORTH, CHRISTOPHER H PRATT, MICHAEL C MELYSCHER, DEREK BRUMMEL, BRAYDON CALL, TEVITA T FIFITA, GAGE HOOGVELDT, ADAM HORMAN, RICARDO FRANCO, JAMIE M GREENFIELD, NICHOLAS BEREJNOI, ALAN JURMU, MARCUS RAY SPIKES, JOEL ANTONIO LOZA AREVALO, BBT TOWING and PEDRO J SANTIAGO ANTONIO

DECLARATION OF PROBABLE CAUSE:

Your Declarant bases the Information upon the following:

On June 29, 2025, at 22:45 hours, Salt Lake City Police responded to a report of shots fired in the area of 1660 West North Temple, Salt Lake City, UT (84116) (SL25-147689). The complainant, Marcus Spikes, identified himself as a tow truck driver. He reported that a Hispanic male in a white van shot at him multiple times. Marcus informed dispatch that he had attempted to tow the suspect's vehicle and was subsequently paid by the suspect to drop off the van at the Burger King located at 1660 W North Temple St, in Salt Lake County.

As the suspect was leaving, he fired several shots at Spikes and his co-worker Joel Loza Arevalo, hitting the front driver-side tire of his tow truck. Spikes followed the suspect's vehicle West on North Temple until they reached Bangerter Highway, where he exited the highway. He reported that the suspect vehicle continued West onto California Avenue while he pulled into the Chevron gas station at 4025 W 1820 S. While putting air in his truck's tire, Spikes observed the suspect drive by and fire two more gunshots at him. He attempted to follow the suspect from the Chevron parking lot but stopped when he saw Salt Lake City Police Officers arriving.

Salt Lake Police Officers pursued the suspect North on Bangerter Highway, where an exchange of gunfire, initiated by ROJAS-HUERTA, occurred between the suspect and the officers in the area of Bangerter Highway and California Avenue. The suspect fled in his vehicle and traveled onto Eastbound I-80, where officers attempted to perform a precision immobilization technique (PIT) maneuver multiple times. The suspect eventually came to a stop, where one officer rammed their patrol vehicle into the back of the white van, and five officers discharged their weapons from their patrol vehicles. Two Salt Lake Police vehicles were struck by gunfire during the pursuit. Seven shell cases were recovered on Bangerter. Spikes and Arevalo recall three at the Burger King and then two at the Chevron.

The suspect, identified as RAMON ROJAS-HUERTA (DOB: July 25, 1980), was treated at the scene for multiple gunshot wounds and transported to the Intermountain Health Center, where he is currently in the ICU.

During an interview with investigators, Spikes explained that he has an agreement with the Burger King on North Temple Street to tow any vehicles sitting in the parking lot longer than 10 minutes after 9 pm due to the high drug activity. Spikes said he witnessed ROJAS-HUERTA do what he believes was a drug exchange while in the parking lot after exiting the van in a high drug trafficking area of Salt Lake City. Spikes elaborated that he observed Ramon hand cash to another person (female) standing in the Burger King parking lot.

Spikes explained to investigators that ROJAS-HUERTA approached him while the van was on the tow truck and was acting erratically. Spikes said ROJAS-HUERTA was yelling and making odd statements about being from California. Spikes said that he tried to calm ROJAS-HUERTA down, and he eventually paid Spikes \$160 to drop the van from the tow truck. Spikes said this was odd because he only requested \$100 to drop the van from Ramon. As Spikes was preparing a receipt for ROJAS-HUERTA, the van started backing up quickly and struck the rear end of the tow truck. ROJAS-HUERTA then began to flee from the parking lot quickly and pulled out onto the roadway. Then ROJAS-HUERTA began firing a weapon from the moving van at Spikes. Spikes said he feared for his life and believed that ROJAS-HUERTA was trying to kill him. Spikes followed ROJAS-HUERTA heading West on North Temple where he witnessed him run 2 red lights and then drive into a dirt median in the middle of the roadway.

A Detective contacted the registered owner of the vehicle ROJAS-HUERTA was driving, and the registered owner explained that Ramon Rojas-Huerta was an employee of his and ROJAS-HUERTA is authorized to use the vehicle only during working hours. The Detective asked the registered owner if ROJAS-HUERTA had permission to drive the vehicle around 2230 hours on June 29, 2025 and the registered owner said he did not.

During an interview with ROJAS-HUERTA, he explained that he had gone to the Burger King on North Temple to get some food prior to heading home. ROJAS-HUERTA explained he was in his vehicle in the van in the parking lot, and a black tow truck driver (Marcus Spikes) began hooking up to the van. ROJAS-HUERTA said the tow truck driver threatened to blow his head off if he didn't give the tow truck driver \$180.00 to drop the van. ROJAS-HUERTA said he paid the tow truck driver. ROJAS-HUERTA said once the tow truck dropped the van, he left and noticed the tow truck driver began following him. ROJAS-HUERTA said he fired rounds from his gun that he had in the van towards the tow truck to show he had a gun and was able to defend himself. ROJAS-HUERTA said he was driving around and still noticed the tow truck driver following and he was trying to get away. ROJAS-HUERTA explained he was out of fuel in the van and saw the tow truck at the Chevron gas station at 4025 W 1820 S so he continued driving. ROJAS-HUERTA said the tow truck began following him again and then he noticed several Police behind the van with the tow truck following him. ROJAS-HUERTA referred to the Police as Cartel Police or Federal and that they weren't real Police, but friends of the tow truck driver. ROJAS-HUERTA explained he fired several gunshots in the air towards the Police vehicles to show them he could defend himself and get the Police to back off. ROJAS-HUERTA explained that he was rammed by a police truck and the Police then shot him. ROJAS-HUERTA realized they were real Police when he observed a Utah Highway Patrol vehicle. The van driven by ROJAS-HUERTA was totaled, causing damage in excess of \$1,500 when he crashed it. The

tow truck sustained damage to the tire due to a bullet hole.

REQUEST FOR ISSUANCE OF A WARRANT:

Pursuant to Utah Code 77-20-1(2), the State requests that Defendant be held without bail until further notice in this matter on the following grounds:[X] 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. As detailed in the probable cause statement, RAMON ROJAS-HUERTA shot a two tow truck employees and two police vehicles, causing people to fear for their lives. His behavior was erratic and paranoid, resulting in a grave dangers to his intended victims, the community at large and law enforcement. His behavior created a situation in which deadly force was utilized by law enforcement officers to neutralize the threat he posed. Ultimately this resulted in serious injury to himself. He is a unreasonable danger to the public and must remain in custody to preserve the public safety.

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: 7th day of July, 2025

/s/ DEREK BRUMMEL
Declarant

Authorized for presentment and filing:

SIM GILL, District Attorney

/s/ Adrianna Davis
Deputy District Attorney
7th day of July, 2025
AD / MM / DAO # 25.014035

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
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