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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.

RAOUL BEDOANG,
DOB: 11/04/2006
1258 West River Bed Drive #1212
West Valley City, UT 84119

Defendant.

Screened by: HOMICIDE TEAM
Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 24.010049

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: IN JUVENILE
DETENTION

Case No.

The undersigned Detective H. Celigija - Murray Police Department, Agency Case No. MR24-16439, upon a written declaration states on information and belief that the defendant, RAOUL BEDOANG, committed the crime(s) of:

COUNT 1

MURDER, 76-5-203, a First Degree Felony, as follows: That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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, 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; and the actor acted with the intent required as an element of the 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 BODILY INJURY, 76-10-508.1, a Second Degree Felony, as follows: That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 injury to any person.

COUNT 7

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows: That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 8

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows: That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 9

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows:
That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 10

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows:
That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 16

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows:
That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 17

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows: That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 18

FELONY DISCHARGE OF A FIREARM, 76-10-508.1, a Third Degree Felony, as follows: That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, 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 19

RETALIATION AGAINST A WITNESS, VICTIM, OR INFORMANT, 76-8-508.3, a Third Degree Felony, as follows: That on or about May 30, 2024, at Birkhill Boulevard and Fireclay Avenue, in Salt Lake County, the defendant did believing that an official proceeding or investigation was pending, was about to be instituted, or had been concluded,

- (a)(i) make a threat of harm; or
- (ii) cause harm; and
- (b) directed the threat or action:
 - (i) against a witness or an informant regarding any official proceeding, a victim of any crime, or any person closely associated with a witness, victim, or informant; and
 - (ii) as retaliation or retribution against the witness, victim, or informant.

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

Detective H. Celigija, Detective T. Blauer, Detective A. Capes, R.B., Detective J. Allred, and Dr. Murie.

DECLARATION OF PROBABLE CAUSE:

Your affiant bases probable cause on information and evidence collected by Murray Police Department, Case No. MR24-16439 and the following:

The statement of Murray Police Detective A. Capes that on May 30, 2024, he responded to shots fired at Birkhill Boulevard and Fireclay Avenue, in Salt Lake County. It was reported that one victim, later identified as Abdiaziz Abdirahman, had multiple gun shot wounds with two entries to the head and was later declared deceased at the hospital. A second victim, identified as 14-year-old A.M., had multiple gunshot wounds in the back and was possibly paralyzed. A third victim, identified as 16-year-old G.M., had a bullet wound to his index finger, and a fourth victim, identified as Aliaksandr Akushn, had a minor shrapnel wound to the back. Detective Capes was advised there is an ongoing dispute between 4500 Block (45 or 4500) gang and NIB (Niggers in Black or Niggas in Black) gang. NIB gang members were later identified as the gunshot wound victims.

The statement of Murray Police Detective T. Blauer that he was informed that UTA Police were reviewing video footage and identified a possible involved vehicle. The vehicle was a White Chrysler Sebring. Video footage shows that at approximately 19:06 hours, the Chrysler is seen eastbound on Fireclay Avenue and passes the group of victims walking westbound. As the Chrysler passes the victims, video shows members of the group drop to the ground and several begin to move quickly. The Chrysler then returns westbound very shortly after the shooting occurred.

Detective Blauer reviewed video surveillance obtained from Utah Retail Merchants. One of the video clips captures a white car matching the Chrysler Sebring driving eastbound after what appears to be the group of victims crossing the street from the North to the South side. The second video clip has an imbedded camera name "Outside Main & Fireclay Face West". The camera is on the southside of the building facing southwest. At timestamp 19:07:05, a white passenger vehicle enters the frame at a high rate of speed. On the same video at timestamp 19:07:18 the vehicle is seen exiting the "City Corner" store parking lot and moving west on Fireclay. The vehicle matches that seen on UTA video footage.

Detectives located 18 empty 9mm shell casings on scene.

The statement of Murray Police Detective J. Allred that the white Chrysler Sebring was later found parked along the west side of Brick Oven Way facing south. The Chrysler matched the one seen on video footage. Detective Allred researched the license plate located on the Chrysler which came back registered to R.B. who lived on Fireclay Avenue.

Post-Miranda R.B. stated that a group of people had come up to him while he was sitting in his car, and asked if he knew RAOUL BEDOANG. R.B. told the group he did and called BEDOANG. BEDOANG had a conversation with the group about basketball and playing basketball. R.B. stated that later BEDOANG and several other juveniles knocked on his apartment door and asked R.B. to help them look for the group who had first spoken to him. R.B. stated that they walked around the block for a little bit and then R.B. suggested they get into his car and check near Trax. R.B. stated that BEDOANG wanted to find the group because he wanted to play basketball with them. R.B. stated that BEDOANG was in the front passenger seat and that there were three other guys in the back seat. R.B. stated that as he approached the intersection of Birkhill Blvd and Fireclay Avenue, traveling eastbound on Fireclay Avenue, BEDOANG rolled down the window and then rapidly discharged his firearm multiple times at a group of people. R.B. stated that while BEDOANG was shooting at a group of people, the males in the backseat were yelling profanities at the group. R.B. was then told to drive away quickly from the area. R.B. stated that he continued eastbound on Fireclay, turned southbound onto Main Street, pulled into the nearby parking lot to make a U-turn, then proceeded to drive westbound on Fireclay Avenue passed the scene. R.B. stated that when he parked his car, BEDOANG and the other juveniles in the car fled. R.B. stated that prior to BEDOANG leaving his car, BEDOANG told R.B. that he needed to stay quiet "or else." R.B. stated that he didn't know the juveniles in the backseat, and they were all wearing black clothing with black ski-mask like masks on their heads.

Dr. Murie with the Utah State Office of the Medical Examiner conducted an autopsy on Abdiaziz Abdirahman. Dr. Murie located two bullet wounds to Abdiaziz's head area, one appeared to have punctured the top of the skull with a full fracture occurring; the other wound to the head penetrating and exiting the head. Dr. Murie also found multiple wounds to Abdiaziz' lower body area, including a bullet wound to Abdiaziz' right thigh that shattered his femur. Additionally, there were bullet fragments found in Abdiaziz' right calf and part of a bullet found in his pelvic area. Dr. Murie determined the cause of death as gunshot wound to the head and the manner of death as homicide.

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 first degree 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 is a member of the 4500-block gang. On the day of the shooting, the defendant, under the guise of finding his friends to play basketball, got a person now a witness to drive him and three other males around to look for the group. When the defendant located the victims walking down the road, he rolled down his window, pulled out a gun and opened fire, shooting approximately 18 times towards the group. One victim died of a gunshot wound to the head, a second victim is possibly paralyzed, the third victim had a gunshot wound to his index finger which requires surgery and a fourth victim, a by stander, was grazed by a bullet. Three of the victims are known to be part of the NIB gang. The defendant had no concern for the safety of the community when he started shooting during broad daylight and near a Trax station. The defendant is a clear danger to the community and 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: 20th day of June, 2024

/s/ Haris Celigija
Declarant

Authorized for presentment and filing:
SIM GILL, District Attorney

/s/ John Ham
Deputy District Attorney
20th day of June, 2024
JH / MM / DAO # 24.010049

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge