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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
Address Unknown
AKA: Oluwatobi Shokunbi
OTN#:
SO#: 450225
SID#/BCI#: 1387588
Booking#:

Defendant.

Screened by: EMILY CROSS
Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 24.016039

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: NOT BOOKED

Case No.

The undersigned Police Officer Matthew Overman - Salt Lake City Police Department, Agency Case No. 24-208019, upon a written declaration states on information and belief that the defendant, OLUWATOBI OLUDAISI SHOKUNBI, committed the crime(s) of:

COUNT 1

CRIMINAL TRESPASS (DWELLING), 76-6-206(2A)+(3B), a Class A Misdemeanor, as follows: That on or about September 7, 2024, at Salt Lake County, the defendant did unlawfully enter or remained in a dwelling or any portion of a dwelling and:

(i) intended to cause annoyance or injury to any person or damage to any property, including the use of graffiti as defined in Section 76-6-107;

(ii) intended to commit any crime, other than theft or a felony; or

(iii) was reckless as to whether his presence would cause fear for the safety of another.

(b) knowing the person's or unmanned aircraft's entry or presence is unlawful, the person enters or remains on or causes an unmanned aircraft to enter or remain unlawfully over property to which

notice against entering is given by:

- (i) personal communication to the person by the owner or someone with apparent authority to act for the owner;
- (ii) fencing or other enclosure obviously designed to exclude intruders; or
- (iii) posting of signs.

COUNT 2

LEWDNESS - FIRST OR SECOND OFFENSE, 76-9-702(1), a Class B Misdemeanor, as follows: That on or about September 7, 2024, at Salt Lake County, the defendant did under circumstances not amounting to rape, object rape, forcible sodomy, forcible sexual abuse, aggravated sexual assault, sexual abuse of a minor, unlawful sexual conduct with a 16- or 17-year-old, custodial sexual relations under Section 76-5-412, custodial sexual misconduct under Section 76-5-412.2, custodial sexual relations with youth receiving state services under Section 76-5-413, custodial sexual misconduct with youth receiving state services under Section 76-5-413.2, or an attempt to commit any of these offenses, performs any of the following acts in a public place or under circumstances which the person should know will likely cause affront or alarm to, on, or in the presence of another who is 14 years old or older:

- (a) an act of sexual intercourse or sodomy;
- (b) exposes his or her genitals, the female breast below the top of the areola, the buttocks, the anus, or the pubic area;
- (c) masturbates; or
- (d) any other act of lewdness.

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

Matthew Overman, Elizabeth L Bennett, Braydon Call, Angie Nieto and Fiorella A Contreras.

DECLARATION OF PROBABLE CAUSE:

Your Declarant bases the Information upon the following:

The statement of Salt Lake Police Officer Bennett that on or about September 7, 2024, she made telephone contact with F.C. F.C. stated that a male, later identified as OLUWATOBI OLUDAISI SHOKUNBI, entered her apartment in Salt Lake County. SHOKUNBI opened her bedroom door and stated, "I'm looking for a beautiful lady." F.C. did not know SHOKUNBI and told him to leave. SHOKUNBI then proceeded to enter A.N.'s room. A.N. knew who SHOKUNBI was from her work, but did not know him personally. A.N. told him to leave. SHOKUNBI left the apartment. Neither F.C. or A.N. invited SHOKUNBI over and are unaware how he learned where they live.

The statement of Salt Lake Police Officer Call that he reviewed surveillance footage from the complex and was able to positively identify SHOKUNBI as the male that entered F.C. and A.N.'s apartment.

The statement of Salt Lake Police Officer Jurmu that on or about September 7, 2024, he responded to the same apartment complex and made contact with Marco Garcia. Garcia stated that he observed SHOKUNBI standing in the apartment's community room completely naked, exposing his penis and testicles. Officer Jurmu then made contact with SHOKUNBI and took him into custody.

MOTION FOR PRETRIAL DETENTION:

The State hereby request that the Court issue a Warrant of Arrest in the above-entitled case for the reason that 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 Criminal Trespass of a Dwelling, a Class A Misdemeanor, and Lewdness, a Class B Misdemeanor and there is substantial evidence supporting the charges 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 victims' statement that the Defendant entered the victims' residence and proceeded into two bedrooms while the occupants were sleeping. One victim did not know the Defendant and told him to leave. The second knew the Defendant from work, but had not invited him over and was unaware how he found out where she lived. Later the same day, the Defendant was found in the community room of the victims' 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. The Defendant has demonstrated himself to be a danger to the victims and the community by entering the victims' residence uninvited.

In addition, the Defendant is the subject of a separate pending case (DA case number 24.016631), in which the Defendant entered another female 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. 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 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 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 the incident, 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 victims will suffer further harm at the hands of the defendant.

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: 19th day of September, 2024

/s/ MATTHEW OVERMAN
Declarant

Subscribed and sworn to before me this 19th day of September, 2024

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Emily Cross
Deputy District Attorney
19th day of September, 2024
EC / TS / DAO # 24.016039

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
Third District Court, SALT LAKE DEPARTMENT	241911349	Blanch, James	24.016631	Count 1 76-5-106.5(2)+(3A) STALKING (Class A Misdemeanor)