

SIM GILL, Bar No. 6389
District Attorney for Salt Lake County
EMILY CROSS, Bar No. 17191
Deputy District Attorney
35 East 500 South
Salt Lake City, Utah 84111
(385) 468-7600
ecross@saltlakecounty.gov

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.

SAYED ZEINULLAH MOUSAVI
DOB: 03/21/1997
1287 East Alta Heights Drive
Sandy, UT 84094
OTN#: 68107655
SO#: 452654
SID#/BCI#:
Booking#: 24050575

Defendant.

Screened by: EMILY CROSS
Assigned to: TO BE ASSIGNED

INFORMATION

DAO # 24.019785

BAIL: NO BAIL WARRANT

WARRANT/RELEASE: IN JAIL-PRD
11/04/2024

Case No.

The undersigned Officer Amanda Walton - Sandy City Police Department, Agency Case No. SY2024-54139, upon a written declaration states on information and belief that the defendant, SAYED ZEINULLAH MOUSAVI, committed the crime(s) of:

COUNT 1

THREAT OF TERRORISM - USE OF WEAPON / HOAX MASS DESTRUCT, 76-5-107.3(2AI), a Second Degree Felony, as follows: That on or about October 31, 2024, at 8900 South 700 West, the defendant did threaten to commit an offense involving bodily injury, death, or substantial property damage and the actor:

- (i)(A) threatens the use of a weapon of mass destruction; or
- (B) threatens the use of a hoax weapon of mass destruction.

COUNT 2

FAILURE TO RESPOND TO OFFICER'S SIGNAL TO STOP, 41-6A-210, a Third Degree Felony, as follows: That on or about October 31, 2024, at 8900 South 700 West, 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 3

FAILURE TO RESPOND TO OFFICER'S SIGNAL TO STOP, 41-6A-210, a Third Degree Felony, as follows: That on or about October 31, 2024, at 8900 South 700 West, 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 4

FAILURE TO RESPOND TO OFFICER'S SIGNAL TO STOP, 41-6A-210, a Third Degree Felony, as follows: That on or about October 31, 2024, at 8900 South 700 West, 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 5

DRIVING ON SUSPENDED OR REVOKED OPERATOR'S LICENSE, 53-3-227(1), a Class C Misdemeanor, as follows: That on or about October 31, 2024, at 8900 South 700 West, the defendant did drive any motor vehicle upon the highways of this state while the defendant's driving privilege was denied, suspended, disqualified or revoked.

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

Marcelo Rapela, Gary Maddox, Kevin Callahan, Travis Unrein, Cori Biggs, Ryan Johnson
And Amanda Walton

DECLARATION OF PROBABLE CAUSE:

Your Declarant bases the Information upon the following:

The statement of Sandy Police Officer Johnson that on or about October 31, 2024, at 8900 South 700 West in Salt Lake County, he observed a vehicle that was listed as stolen parked in a parking lot. Officer Johnson activated his emergency lights and parked behind the vehicle. Officer Johnson told a male later identified as SAYED ZEINULLAH MOUSAVI, who was next to the vehicle, to stop, but MOUSAVI entered the vehicle and left the area at a high rate of speed. Officer Johnson did not pursue MOUSAVI and parked on the side of the road. A short time later,

MOUSAVI drove by Officer Johnson again, parked the vehicle and exited. Officer Johnson activated his emergency lights a second time and told MOUSAVI to stop. MOUSAVI gave Officer Johnson the middle finger, got back in the vehicle and left the area at a high rate of speed.

The statement of Sandy Police Officer Biggs that he observed the vehicle nearby and activated his emergency lights, but MOUSAVI did not stop. As MOUSAVI continued to drive away, Officer Biggs discontinued the pursuit but continued to follow the vehicle. A short time later, MOUSAVI's vehicle was disabled, and he was taken into custody.

In a records check, it was found that MOUSAVI's driver's license was suspended.

In a search of the vehicle, a paper with writing stating, "Pressure Israel to cease fire with killing significant jews in Gaza. And lets take non hostage. Only soldiers/male government. Conduct assignation of leaders. Attack Military sites with most expensive bombs. Plant bombs inside Z-jets." was found.

Officer Biggs then transported MOUSAVI to jail, and MOUSAVI stated he was going to kill Americans and kill the U.S.A. and to watch the news in two weeks to a month if Officer Biggs did not believe him. MOUSAVI then stated that he was going to buy guns and shoot up the Sandy Police Department.

REQUEST FOR ISSUANCE OF A WARRANT:

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 MOUSAVI be held without bail until further notice in this matter on the following grounds: MOUSAVI is charged with a felony and there is substantial evidence supporting the charge and clear and convincing evidence that MOUSAVI 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. There is substantial evidence to support the charges based on the statement of the alleged victims and the physical evidence found on the defendant. There is also clear and convincing evidence that the defendant would constitute a danger to the victims. Here, MOUSAVI allegedly fled from several different officers to avoid being taken into custody. Once MOUSAVI was in custody, he stated several times that as soon as he was released, he would kill Americans. MOUSAVI also stated he was going to buy guns and shoot up the Sandy Police Department in four weeks. These allegations show that MOUSAVI poses a significant risk of danger to the victims and the community if he is released on bail. This warrant is necessary to protect the safety and welfare of the victims, and the community.

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: 1st day of November, 2024

/s/ AMANDA WALTON
Declarant

Subscribed and sworn to before me this 1st day of
November, 2024

Authorized for presentment and filing

SIM GILL, District Attorney

/s/ Emily Cross
Deputy District Attorney
1st day of November, 2024
EC / TS / DAO # 24.019785

OTHER PENDING CASES FOR THE DEFENDANT

Court	Court Case #	Trial Judge	DAO #	Charge
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