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THIRD DISTRICT COURT SALT LAKE COUNTY, STATE OF UTAH	
STATE OF UTAH, Plaintiff, vs. GILLI ANN MEJIA 35 W. CENTER STREET MIDVALE, UT 84047 DOB: 03/17/1982 Defendant.	INFORMATION (Warrant Requested) Case No. Judge:

The undersigned, Special Agent S. Jensen, of the Utah Attorney General's Office, states on information and belief that the defendant, Emanuel R. Morales, either directly or as a party to the offense, knowingly or intentionally committed the following crimes:

COUNT ONE: RETAIL THEFT, a Second Degree Felony, in violation of U.C.A. §§ 76-6-602 and 76-6-412(1)(a), as follows: On or about December 2022 through May 2023, in Utah, Davis, Salt Lake, and Weber Counties, Utah, the defendant, took possession of, concealed, carried away, transferred or caused to be carried away or transferred, merchandise displayed, held, stored or offered for sale in retail mercantile establishments, with the intention of retaining such merchandise or with the intention of depriving the retail establishments permanently of the possession, use or benefit of such merchandise without paying the retail value of such merchandise, and the value of the property exceeded \$5,000.

COUNT TWO: RECEIVING STOLEN PROPERTY, a Second Degree Felony, in violation of U.C.A. §§ 76-6-408 and 76-6-412(1)(a), as follows: On or about the period from September 2022 to February 2023, in Salt Lake, County, Utah, the defendant received, retained or disposed of the property of another knowing that the property is stolen or believing that the property is probably stolen, or did conceal, sell, withhold, or aid in concealing, selling, or withholding the property from the owner, knowing or believing the property to be stolen, intending to deprive the owner of the property, and the value of the property exceeded \$5,000.

COUNT THREE: PATTERN OF UNLAWFUL ACTIVITY, UCA § **76-10-1603**; a SECOND-DEGREE FELONY, as follows: that on or about December 2022 through May 2023, in Salt Lake County, State of Utah, the defendant Emanuel R. Morales

- a. Having received any proceeds derived, whether directly or indirectly, from a pattern of unlawful activity in which he has participated as a principal, did use, or invest, directly or indirectly, any part of that income, or the proceeds of the income, or the proceeds derived from the investment or use of those proceeds, in the operation of a criminal enterprise, to wit a loosely associated group of individuals as described here and after.
- b. Through a pattern of unlawful activity did maintain, directly or indirectly, any interest in or control of a criminal enterprise, or,
- c. Did conduct, or participate, whether directly or indirectly, in the conduct of that enterprise's affairs through a pattern of unlawful activity.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES: Steven Jensen, Jerome Smith, Jeremy Hernandez, Cristal Romero, Josh Grabel.

DECLARATION OF PROBABLE CAUSE:

1. I, the undersigned, am a Special Agent assigned to the Crimes Against Statewide Economy (CASE) Task Force with the Utah Attorney General's Office responsibility to investigate economic crimes that occur within the State of Utah.
2. I have been investigating the activities of Emanuel Morales and Raymundo Vivanco since December 2022.
3. On March 8, 2023, I viewed cctv evidence of these two suspects stealing items from the Burlington Store in Sandy Utah.
4. On April 6, 2023, I conducted surveillance of Honda Accord registered to Emanuel Morales and observed the vehicle in the parking lot of the Sierra clothing store in

Taylorsville, Utah. Josh Grabel, a loss prevention officer for Sierra reported to me that the two suspects entered the store, took two bags of shoes containing approximately 20 pairs of high valued sneakers out of the store without paying for them and left in the Honda vehicle.

5. Over the time of the investigation, I have observed and documented these individuals stealing merchandise on a regular basis culminating the past several weeks to two to three times a week from multiple stores including Kohls, Sierra, Burlington, Marshalls, and TJ Maxx.
6. Although a thorough accounting is still pending, the total loss accounted so far from TJ Maxx, Marshall's and Sierra is \$7,530.43.
7. The pattern of Illegal activity is for Morales and Vivanco to engage in a pattern of illegal activity by boosting merchandise and delivering the merchandise to persons who receive the property (fences), including Gilli Ann Mejia, Yenni Jimenez Magana, Marcus Jackson and Bobbi Jo Carter.
8. GPS tracker warrants were obtained for vehicles involved in the thefts and the subsequent delivery and exchange of the merchandise to storage locations.
9. One of the vehicles to which stolen merchandise was transferred was a 2008 Nissan Titan registered to Yenni Jimenez Magana. On April 5, 2023 Yenni Jimenez Magana was seen in the Nissan Titan receiving merchandise from Raymundo Vivanco. On April 14, 2023 Agents from the Attorney General's office had placed a tracking device in a purse that was subsequently stolen. The record from the tracking device placed the device in the Nissan Titan at locations frequented by the suspects.
10. On April 24, 2023, Raymundo Vivinco was seen on CCTV inside of a Marshalls retail store, leaving with a large bag of unpaid merchandise. That same day I observed Vivinco take bags of merchandise into a Chevron gas station and deliver it to Bobbi Jo Carter. TJ Maxx investigator Josh Grabel observed Carter and Marcus Jackson take the bags of merchandise away in a white Chevrolet Trailblazer.
11. Through surveillance I have observed merchandise being transferred to Gilli Ann Mejia, and Bobbi Jo Carter, Yenni Jimenez Magana, and Marcus Jackson (aka Monster),
12. Through the investigation there is evidence of a criminal enterprise in which at least six persons are involved with various roles, to wit: Morales and Vivanco are primarily Boosters, Mejia, Magana, Jackson and Carter receive, store and dispose of the stolen merchandise.
13. Because the thefts have been increasing with large value thefts taking place every two or three days, this enterprise constitutes an immediate and continuous threat to the State-Wide economy justifying the issuance of an arrest warrant.

NOTICE OF ADDITIONAL PENALTIES:

In addition to penalties prescribed by law, the court may order the defendant to pay the **costs** of investigating and prosecuting the offense.

In lieu of a fine otherwise authorized by law for a violation of section 76-10-1603, a defendant who derives net proceeds from a conduct prohibited by section 76-10-1603 may be **fin**ed not more than twice the amount of net proceeds of the enterprise.

Pursuant to Utah Code Ann. Section 78B-18a-106 (2018), I declare under criminal penalty under the law of Utah that the foregoing is true and correct.

Executed:

/s/ S. Jensen

S.A. S. Jensen, Declarant.

Electronically signed by permission

Dated May 18, 2023, at 1:35pm.

Authorized for presentment and filing:

SEAN REYES

Utah Attorney General

/s/ Brian J. Namba

BRIAN J. NAMBA

Assistant Attorney General