

**STEPHEN J. STOCKS**, No. 16164  
Grand County Attorney  
125 East Center Street  
Moab, Utah 84532  
Telephone: (435) 259-1324

**IN THE SEVENTH DISTRICT COURT  
IN AND FOR GRAND COUNTY, STATE OF UTAH**

<p><b>THE STATE OF UTAH,</b> <i>Plaintiff,</i></p> <p>vs.</p> <p><b>AIDAN RUSSELL HOFFMAN,</b> <i>AKA: Aidan Hoffman</i> [REDACTED]</p> <p>DOB: [REDACTED] <i>Defendant.</i></p>	<p><b>INFORMATION, STATEMENT OF PROBABLE CAUSE AND REQUEST FOR NO BAIL WARRANT</b></p> <p>Case No. GCAO No. 019240442</p> <p>Custody Status: Not in Custody; Request for Warrant</p> <p>Judge: Don M. Torgerson</p>
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THE UNDERSIGNED COMPLAINANT, STEPHEN J. STOCKS, states on Information and belief that the Defendant committed, in the above-named county, the crime(s) of:

**COUNT 1: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 2: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 3: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 4: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 5: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 6: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 7: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 8: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 9: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023, and June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

**COUNT 10: AGGRAVATED SEXUAL EXPLOITATION OF A MINOR**, in violation of Utah Code Ann. §76-5B-201.1(2)+(3A), a First Degree Felony, as follows:

Between the dates of May 26, 2023 through and including June 10, 2023, in Grand County, the defendant did commit sexual exploitation of a minor if the actor:

(a) intentionally distributed child sexual abuse material.

### STATEMENT OF PROBABLE CAUSE

Your affiant bases probable cause on information and evidence collected by Detective L. Leavitt, of the Grand County Sheriff's Office, case # 2307455 and the following:

The Statement of Detective Leavitt, on August 19, 2023, in Grand County, Utah, received a Cyber Tipline Report (HEREINAFTER "cyber tip"), from the Utah Attorney General's Office Internet Crimes Against Children Task Force (ICAC), for investigation. Detective Leavitt found the coordinates for the IP address being used was in the Moab area.

The cyber tip contained information that MediaLab/Kik, a mobile/computer application which is known as a common means for persons involved in the possession and distribution of child sexual abuse material (CSAM) to communicate, obtain, and distribute CSAM.

The Kik user ID [REDACTED] (screen/username [REDACTED] and email address [REDACTED] had been active on the application with IP addresses being captured on several different occasions. The cyber tip indicated that all of the files listed in the cybertip were viewed in their entirety by Kik and were recognized as CSAM.

Det. Leavitt pursued search warrants with Emery Telcom and Verizon Wireless for information regarding the Internet provider who accessed the IP address between the dates of May 26, 2023, and June 10, 2023. Emery Telcom provided information as to the name and address of [REDACTED]. A Verizon record indicated a phone number, [REDACTED], which had accessed the Verizon IP address and was used to distribute CSAM from the device and was in the Grand County Area. Det. Leavitt was able to use the Kik and Verizon records to confirm that the phone number had accessed the Kik account during the times in which the CSAM was sent. Det. Leavitt was advised that Maine State Police performed an investigation for the same phone number distributing CSAM. That investigation showed possible connections in North Carolina.

Det. Leavitt interviewed the homeowner, M.D. located at [REDACTED]. M.D. stated that his relative identified as AIDAN HOFFMAN, was staying at the residence during this time frame and was house sitting while the family was on vacation out of state. M.D.

provided HOFFMAN's cell phone number which matched the number distributing CSAM in Moab. When the family returned home, HOFFMAN remained in the Grand County area in his van, while the CSAM files were being distributed from this phone number.

During the investigation and reviewing the CSAM that had been distributed through Kik, Det. Leavitt confirmed that HOFFMAN had distributed over 10 files of CSAM to other Kik users while in the Grand County Area. The CSAM files contained nude or mostly nude, prepubescent females of varying ages of 3 to 12 years of age in videos and photos. One file sent by HOFFMAN on June 10, 2023 at 22:15:07 using the IP address 174.204.6.54, a confirmed Verizon IP address, depicting a female approximate age between 5-8 years old and prepubescent. The child observed to be on her knees while bent over at the waist away from the camera. The child was wearing a pink top pushed up towards her neck. Her anus is fully visible to the camera while her vagina is partially obstructed, but still visible. An erect penis, appearing to belong to an adult male is seen directly above the buttocks and anus of the child. The male masturbates and ejaculates onto the buttocks and lower back of the child. The age of the child is based on the body structure of the female, lack of body hair and facial structure.

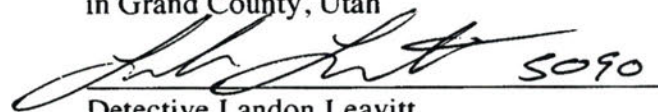
Additionally, Det. Leavitt was advised that HOFFMAN does not have an address, he lives in his van and may be in the area of Snowmass Colorado and may be planning to move to Arizona.

### **REQUEST FOR NO BAIL WARRANT AND PRETRIAL DETENTION**

Pursuant to Utah Code Ann. § 77-20-201(1)(c), the Defendant is not entitled to bail as a matter of right due to his flight risk and the substantial danger to the community the he presents. The Defendant is being charged with a first-degree felony. HOFFMAN was in Grand County, Utah, house sitting for a family member. HOFFMAN has limited connection to Moab. There is clear and convincing evidence he is a danger to the community and other communities he may reside in. This is not the only incident that has been investigated involving this Verizon phone number. Given the severity of the crime and his limited connection to Moab, a no bail warrant is the only way to ensure his appearance in court.

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

Signed on the 8 day of August, 2024,  
in Grand County, Utah

A handwritten signature in black ink, appearing to read "Landon Leavitt" followed by the number "5090". The signature is written over a horizontal line.

Detective Landon Leavitt  
Declarant

Authorized for presentment and filing

*Stephen J. Stocks*

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Stephen J. Stocks  
Grand County Attorney

NOTICE OF RIGHT TO DISCOVERY: Under Rule 16 of the Utah Rules of Criminal Procedure a defendant has the right to inspect, test, and copy material and information directly related to the case of which the prosecutor team has knowledge and control. If you would like to exercise that right, please contact the Grand County Attorney's Office during 8:00 a.m. and 5:00 p.m., at the above contact information to arrange delivery or inspection.