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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

GREGORY AARON FARLEY,

Defendant.

Case No.

4:25-mj-00044-mj

COMPLAINT

Magistrate Judge Paul Kohler

Before the Honorable Paul Kohler, United States Magistrate Judge for the District
of Utah, appeared the undersigned, who on oath deposes and says:

COUNT 1

18 U.S.C. § 111(a)(1)
(Assault on a Federal Officer)

On or about May 3, 2025, in the District of Utah,

GREGORY AARON FARLEY,

the defendant herein, did forcibly assault, resist, oppose, impede, intimidate and interfere with a federal officer, while the federal officer was engaged in and during the performance of his official duties and caused physical contact; all in violation of 18 U.S.C. §§ 111(a)(1).

This complaint is made on the basis of investigation consisting of the following:

1. I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, § 2510(7) and am empowered by law to conduct investigations of and to make arrests for federal criminal offenses. I have been so employed by the FBI since March 2008. I am currently assigned to the FBI Salt Lake City Division, St. George Resident Agency (RA), and assigned to investigate criminal violations, including violent crimes.

2. I make this complaint based on review of bodycam footage, documentation provided to me related to the incident, and communications with other law enforcement officials.

3. On May 3, 2025, U.S. Park Rangers Matthew Brantley and Donald Plassman were driving in a patrol vehicle. Both rangers are law enforcement officers who were working a shift at the Glen Canyon National Recreation Area.

4. Around 7:25 p.m.,¹ dispatch received a call reporting erratic driving and behavior by someone in a white pickup truck near Lone Rock Beach at Lake Powell.

5. At 7:47 p.m., the rangers conducted a traffic stop on a white GMC Sierra Denali pickup truck matching the description that the 911 caller provided. The traffic stop occurred on Highway 89 near Lake Powell in Utah. Gregory Aaron FARLEY was driving the truck. While speaking with FARLEY, Ranger Brantley referenced an interaction he had with FARLEY the previous day. At 7:48:51 p.m., while Ranger Brantley was speaking with him at the door, FARLEY drove away and fled the scene of the traffic stop.

6. The rangers returned to their patrol vehicle and followed FARLEY. While returning to the vehicle, Ranger Plassman stated, “he almost hit me.” Below is an approximate timeline of the pursuit:

- a. 7:49:22 p.m.: According to the rangers’ statements recorded on bodycam, FARLEY turned around, began driving in the rangers’ direction, and swerved at the rangers’ vehicle.
- b. 7:49:44 p.m.: The rangers turned around and continued following FARLEY.
- c. 7:50:20 p.m.: Ranger Plassman stated that FARLEY was driving “extremely erratically, headed toward Page.” The rangers also commented that FARLEY

¹ The times referenced in this affidavit are Pacific (Arizona) time.

was swerving and appeared intoxicated based on glassy eyes and driving behavior.

- d. 7:50:44 p.m.: A ranger stated that FARLEY had swerved off the road and hit the dirt.
- e. 7:50:55 p.m.: Ranger Plassman (passenger) said to Ranger Brantley (driver), “Make sure you get out of his way.” At this point, FARLEY had turned around and was again headed in the rangers’ direction.
- f. 7:51:01 p.m.: FARLEY collided with the rangers’ truck on the driver’s side, sending the rangers’ truck into the shoulder of the road, causing the air bags to be deployed, and rendering the driver’s side door inoperable. FARLEY then backed up his truck. FARLEY’s truck was facing the direction of the rangers’ truck. Ranger Brantley exclaimed, “get me out,” and exited through the passenger door.


7. After FARLEY hit the rangers’ truck and backed up, both rangers fired their weapons at FARLEY. Other officers arrived on the scene. At 8:38:26 p.m., FARLEY exited the truck. Officers rendered medical aid and arrested FARLEY.

Based on the foregoing information, I respectfully request that an arrest warrant be issued for GREGORY AARON FARLEY for violation of 18 U.S.C. § 111(a)(1).



Affiant
Special Agent Chris Andersen

SUBSCRIBED AND SWORN to before me this 3rd day of May, 2025.



Paul Kohler
United States Magistrate Judge

APPROVED:

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