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Attorneys for Plaintiff

3RD DISTRICT COURT SALT LAKE COUNTY, STATE OF UTAH	
STATE OF UTAH, Plaintiff, v.	INFORMATION (Summons)
JASON CHRISTOPHER HALL DOB: 01/22/1975 2549 West 14200 South Bluffdale, Utah 84065	Case No Judge:
Defendant.	

The undersigned, Special Agent T. Russell of the Utah Attorney General's Office, states on information and belief that JASON HALL, either directly or as a party to the offense, knowingly or intentionally committed the following crimes:

COUNT ONE: THREATENING ELECTED OFFICIALS-ASSUALT U.C.A.§§ 76-8-313; 76-8-315; 76-5-102, a THIRD DEGREE FELONY. On or about August 14, 2021 in Salt Lake County Utah, the defendant committed an assault on an elected official, to wit J.G., by attempting or threatening, irrespective of a showing of immediate force or violence, to inflict bodily injury to the said elected official with the intent to impede, intimidate, or interfere with the elected official in the performance of his official duties or with the intent to retaliate against the elected official

because of the performance of his official duties, and where bodily injury was attempted or occurred.

COUNT TWO: STALKING U.C.A.§§ 76-5-106.5 (2) (a) (b), (6) (a); 76-2-202, a CLASS A MISDEMEANOR as follows: On or about and between March 1, 2021 and December 31, 2021 in Salt Lake County, State of Utah the defendant did commit, solicit, request, command, encourage or intentionally aid another person by intentionally or knowingly engaging in a course of conduct directed at a specific person, and knew or should have known that the course of conduct would cause a reasonable person to fear for the person's own safety or the safety of a third person or to suffer other emotional distress, to wit: by engaging in two or more acts directed towards J.G., including surreptitious delivery of a numerous objects to J.G.'s place of employment, and by placing an object on or delivering an object to property owned, leased, or occupied by J.G., or to J.G.'s place of employment with the intent that the object be delivered to J.G., or appearing at J.G. or for the purpose of obtaining or disseminating information about or communicating with J.G. to a member of J.G.'s family or household, employer, coworker, friend, or associate of J.G..

COUNT THREE: THREATS TO INFLUENCE OFFICIAL OR PUBLIC ACTION U.C.A. § 76-8-104, a CLASS A MISDEMEANOR. On or about and between March 5, 2021 and November 23, 2021 in Salt Lake County, Utah the defendant did threaten harm to a public servant, party official, or voter, to wit J.G., with a purpose of influencing his action, decision, opinion, recommendation, nomination, vote, or other exercise of discretion.

THIS INFORMATION IS BASED ON WITNESSES: Special Agents T. Russell, S. Hirzel, M. Spilker, B. Kasza, T. Martinsen, J. Schuler, L. Leuluai, E. Spann, A. Connor, and T. Downey; and U.S. Postal Inspector L. Howell, George Schliesser.

DECLARATION OF PROBABLE CAUSE:

 I, the undersigned am a Special Agent working for the Utah Attorney General's Office Investigations Division have been a sworn peace officer for over 34 years. I have a Bachelor in Business Finance from the University of Utah and a Master of Business Administration from Western Governors University. Prior to being employed by the Utah Attorney General's Office, I was a Special Agent with the United States Department of Justice, Drug Enforcement Administration (DEA) for over 20 years. Prior to that I was a Detective with the Salt Lake County Sheriff's Office (Unified Police Department) for over 10 years. I have been employed by the Utah Attorney General's Office for four years. I am currently assigned to the Special Investigations and Public Corruption Unit (SIPCU), tasked with the investigation of felony level crimes that are related to fraud, bank fraud, public corruption, sexual assaults, homicides, and numerous other felony level crimes.

- 2. On March 5, 2021, J.G., an elected Bluffdale City councilman, who at the time was running for a Bluffdale mayor, received an email to his personal email address from an email account identified as CPACBLUFFDALE@GMAIL.COM. In this email message, J.G. was advised by the writer (and/or his organization) that he/she is a long-time resident of Bluffdale and has been involved either directly or indirectly in politics for the past 35 years. The writer continued to explain that although he/she had "high hopes" for J.G. in the beginning of his political career at Bluffdale he/she now finds J.G.'s "paper-thin skin" and lack of experience to be a "poor combination for a politician." The writer continued to accuse J.G., among other things of "grandstanding", "schoolyard bully", "not a statesman", "lash out viciously at anyone who contradicts you", and "defensive." There were no overt threats of harm, but the language descriptions were distinctive.
- 3. The email then concluded: "should we not see an apology to the mayor AND to the city for your temper tantrum, there will be significant efforts made to replace you when you are up for reelection" and "you should know that the wheels are in motion to render you irrelevant." The final sentence in the email ended with "I write this letter on behalf of a group of like-minded conservatives who are determined to restore civility to our local politics." No author was disclosed in the email, but after investigation, the defendant, who is the spouse of another Bluffdale city employee seeking the same elected office as J.G., admitted in a non-custodial setting to me to having sent said email.
- 4. On March 9, 2021, J.G. received a package at his residence, with a mailing address incorrectly omitting the "W" or "West" from the street address on the package. This package contained a children's book on Anger Management and two notes. The first printed note read, "I hope this helps with your issues buddy." A second computer printed note included in the package read, "Hey Imbecile !!!!!! Move out of Bluffdale, apologize or kill yourself. It's time for you to start watching your back. This is your final warning. We are moving to the next phase. Do what we ask, or we will do what must be done."
- 5. On March 9, 2021, a large box containing gag gifts, was delivered to the Bluffdale city offices with a small gift bag of gag gifts addressed to each councilman and the mayor. The large box containing these gifts were delivered by a white adult male driving a Chevrolet pickup, who was wearing a blue body/gray sleeved hoodie, a baseball cap, sunglasses, and a mask, in an attempt at concealment. The gift bags were labeled as "City Council Meeting Survival Kit," and were gifts given with instructions on how and when to use the gifts to deal with J.G. during council meetings. The gifts given to the councilmen also came with notes attached explaining their purpose, such as "Reflective glasses with a note which read "To hide your eye rolls at (J.G.'s) Posturing and Self -aggrandizement," a baby's bottle and formula and a note which read "in case (J.G.) gets cranky and needs his ba-ba," a Baby's "Binky," with a note that read "To help sooth you in case someone says something you don't

like. Poor little guy," (a "Blanky," a juice box, a binky, fruit snacks, "pull-up" diapers, etc.).

- 6. Video surveillance footage from the Bluffdale City Office's security cameras revealed a white male adult that delivered the above-described package to be driving a newer model white Chevrolet crew cab (double cab) pickup with a steel tool chest in the back bed, dark tinted back windows, two black squares on the hood, and an "In God We Trust" type license plate. The numbers on the plate were not visible from this camera and the plates were covered with cardboard. This truck was later identified as being a white 2013 Chevrolet Silverado K2500HD with "In God We Trust" license plates and bearing the Utah license plate 7H4LX. After lengthy investigation it was ascertained this truck to be registered to George Martin Schliesser (DOB: 01/15/1958), who has admitted he made this delivery.
- 7. On March 24, 2021, J.G. received a letter mailed to the Bluffdale City Offices with a mailing address that omitted the "W" or "West" from the proper office address. This letter used similar language to the email citing J.G.'s "paper-thin skin," and then read "it has become very clear lately our messages are not getting across to you. We are ready to move to the next phase. You will no longer have the will to live in Bluffdale. It's time we put you down like the Dog you are, not a statesman."
- 8. On June 14, 2021, J.G. received another email from CPACBLUFFDALE@GMAIL.COM. This email encouraged J.G. to run for mayor and used comments/phrases like: "amusing to destroy you politically, sentiment of the city has turned against you, you're a joke, and Manchild for mayor."
- 9. On July 20, 2021, J.G. received another email from CPACBLUFFDALE@GMAIL.COM. In this short email, the writer mocked the candidates and called J.G. an imbecile. The word "Imbecile" was also used in the package that was delivered to J.G.'s residence on March 9, 2021.
- 10. On August 14, 2021 the defendant rented a political booth in the same area as one rented by J.G. and got upset at J.G. and threw pollical signs of John Roberts at J.G., striking him, causing piercing of the skin and bruising, and persisted in a long discourse of berating, insulting and demeaning J.G. In fact, J.G. had chosen to support John Roberts, an opponent of defendant's wife for mayor.
- 11. On November 2, 2021, J.G. received a package at his residence mailed from the SLC downtown post office, which contained a court jester's hat and a message that read "you've earned this." This package had a handwritten mailing label that again did not have the "W" or "West" on the address.
- 12. Agents were able to trace the shipping post office address and video footage that showed the

defendant driving into the gas station parking lot next to the same downtown post office in his 2013 Chevrolet pickup bearing Utah license plate 7H4LX and parking near the front doors. Schliesser can then be seen exiting his pickup wearing the same blue/gray sleeved hoodie jacket, sunglasses, baseball cap, a black mask, and denim pants worn to the Bluffdale City Hall delivery. Schliesser is conclusively identified inside the convenience store purchasing a soft drink and nachos when he momentarily removes his mask to ask the attendant a question and reveals his face. Although still wearing sunglasses, the person in the video has the same facial features and body as Schliesser's drivers' license photo and description. The defendant can be seen presenting his Holiday Oil Club card to the attendant for points. This Holiday Oil Club Card information was later retrieved by one of the Postal Inspectors, and found that it belonged to Schliesser.

- 13. In the video from the Post Office adjacent to the convenience store, which was taken on November 2, 2021, at 11:40am, SA L. Howell of the U.S. Postal Inspector's Office was able to see Schliesser carrying a white box under his left arm of the same color and dimensions as the box delivered to J.G. on November 2, 2022. Schliesser then paid \$16.25 for it to be delivered "Priority Mail 1-Day", to J.G.'s home address with a hand-written address which again omitted the "W" or "West" from the address.
- 14. Schliesser's place of employment is owned by a brother of defendant. Defendant is also employed at the same business as Schliesser. Schliesser refers to defendant as his boss. Defendant admitted to sending the <u>CPACBLUFFDALE@GMAIL.COM</u> emails, and to directing Schliesser to deliver the packages to Bluffdale City council and to J.G's house.
- 15. Due to the threats and intimidating communications and not knowing how many individuals might be involved, J.G, elected not to pursue his election campaign prior to the filing deadline.
- 16. Following the election, on November 23, 2021, J.G. received another letter at his residence which again does not use the appropriate "W" or "West" in the address and said, "You've really earned the hat we sent you" and again states "we" as to imply there is more than one suspect author. The letter then continues with; "Unfortunately, (J.G.) you have shown that you will not change until something is done. It's time you leave Bluffdale or resign. If you don't you will end up dead."
- 17. Schliesser admitted on December 15, 2021, that he mailed/delivered the packages to J.G. and Bluffdale City Council and did so at the instruction of defendant. Schliesser stated he routinely did deliveries for his defendant but provided no explanation why he would surreptitiously do so in this case. Additionally, in a text mail between defendant and

Schliesser, defendant instructed Schliesser not to mention the deliveries to "Nate[sic]."

Pursuant to Utah Code Ann. § 78B-18a-106 (2018), I declare under criminal penalty under the law of Utah that the foregoing is true and correct. Signed on the day of 30th June, 2022 at Salt Lake County, Utah.

Executed: 2 /s/ an

S.A. T. Russell Declarant

Authorized for presentment and filing:

SEAN REYES Utah Attorney General

<u>/s/Steven A. Wuthrich</u> STEVEN A. WUTHRICH Assistant Attorney General Dated: June 30, 2022