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3RD DISTRICT COURT SALT LAKE COUNTY, STATE OF UTAH	
STATE OF UTAH, Plaintiff, vs. MATTHEW ROBERT PROVARD DOB: 10/04/1996 10135 S. Knox Ct. South Jordan, UT 84009 Defendant.	AMENDED INFORMATION (Warrant) Case No.: 231907497 Judge: Adam Mow

The undersigned, Special Agent S. Jensen, of the Utah Attorney General's Office, states on information and belief that the defendant, MATTHEW ROBERT PROVARD, either directly or as a party, committed the crimes of:

COUNT 1: RETAIL THEFT, a Second Degree Felony, in violation of U.C.A. § 76-6-602, as follows: On or about February 11, 2022, in Salt Lake County, 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 establishment, with the intention of retaining such merchandise or depriving the merchant permanently of the possession, use or benefit of such merchandise without paying the retail value of such

merchandise, or did under-ring with the intention of depriving the merchant of the retail value of the merchandise, and the property was a firearm or exceeded \$5,000 in value.

COUNT 2: PATTERN OF UNLAWFUL ACTIVITY, a Second Degree Felony, in violation of U.C.A. § 76-10-1603, as follows: From March 2021 through June 2023, in Salt Lake County, Utah, the defendant did receive any proceeds derived, whether directly or indirectly, from a pattern of unlawful activity in which the defendant has participated as a principal, and defendant 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 acquisition of any interest in, or the establishment or operation of, any enterprise.

THIS INFORMATION IS BASED ON EVIDENCE OBTAINED FROM THE FOLLOWING WITNESSES: Special Agent S. Jensen.

PROBABLE CAUSE STATEMENT:

1. I, Special Agent S. Jensen, am an investigator in the Special Investigations Unit with the Utah Attorney General's Office.

2. I am a police officer with the Taylorsville City Police Department for approximately two years. Prior to this assignment, I was a police officer with the West Valley City Police Department for fifteen years and two years as a police officer at the University of Utah. I am currently assigned as a Detective to the Property Crimes Unit of the Taylorsville police department and assigned to a task with the Utah Attorney General's office, which also includes Fraud and Forgery cases, along with organized criminal investigations. I worked in the Special Investigations Unit of the West Valley City police department and was also previously assigned to the Special Operations Division, dealing with narcotic and gang related investigations. I previously served in the Patrol Division. I have conducted organized criminal investigations into the distribution of illegal drugs, stolen property and Fraud and Forgery, while executing numerous arrests for drug related offenses. I have conducted and executed numerous search warrants that have resulted in the seizure of illegal drugs, fraudulent documents, firearms, stolen vehicles, stolen property, and evidence of other criminal violations. I have supervised the activities of informants who have provided information and assistance resulting in the prosecution of offenders on various criminal investigations.

3. Defendant is an employee of Doug's Shoot' n Sports ("Doug's") located in Taylorsville, Salt Lake County, Utah. The owner of Doug's conducted an audit on his employee's transactions, which included the defendant. Defendant has been an employee with Doug's since February 12, 2020, and has access to the sales system.

4. This audit was conducted to locate any other employee discrepancies. The owner typically allows employees an incentive by allowing them to purchase items from the store at wholesale price. While conducting his records audit, the owner discovered transcripts

from the sales system which showed defendant created a “bogus deposit,” for himself in the amount of \$185.05. This deposit was logged or “timestamped” on 3-20-23 and was similar to how another employee, Stephen Daniel Cord, had operated to defraud the business and acquire firearms and other sundry items related thereto.

5. Defendant would access his profile, place, and then submit a deposit that was fabricated or untrue. This is done by pulling up his customer service credentials and depositing payment for an item, without placing any money into the register.

6. Surveillance footage used to cross reference this fraudulent deposit shows the defendant removed a receipt following the deposit and crumpled it up. There was no credit card run and there was no cash placed into the register.

7. A week later, defendant Matthew purchased a rifle on 3-27-23, while using this fraudulent deposit of \$185.05, towards the total of a rifle described as a Sons of Liberty Rifle.

8. Additional transactions, cross referenced with CCTV surveillance confirms that defendant has taken multiple store accessories home with him between the dates of February 27th and July 3, 2023. There is no verification of payment for those items, and there were no transactions logged for defendant in the Point-of-Sale system for those accessories during that time period.

9. The items fraudulently purchased by defendant includes firearms, ammunition, gun parts, optics, and other firearms accessories. The number of items ordered to defendant that were not paid for, including the fraudulent partial deposit for the rifle, totals \$11,355.60.

10. The defendant and other employee are engaged in a criminal enterprise to obtain firearms, ammunition, gun parts, optics and firearm accessories and profit from the trade or sale these illegally obtained items.

REQUEST FOR ARREST WARRANT AND FOR NO BAIL:

Pursuant to Rule 6(c)(2) of the Utah Rules of Criminal Procedure, and Utah Code Ann. § 77-20-201(1), the State requests that an arrest warrant be issued, and that the defendant be held without bail until further notice in this matter. The defendant is charged with two Second Degree felonies, and based upon the foregoing probable cause statement, there is substantial evidence supporting the charges and clear and convincing evidence that defendant poses a substantial danger to other individuals and to the community as all of the criminal behavior alleged involves firearms. Due to the serious nature of the allegations the defendant should be held without bail.

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

Executed: July 18, 2023

/s/ S. Jensen

SPECIAL AGENT S. JENSEN

*Signed with permission from Agent S. Jensen on
July 18, 2023, at 11:54 am*

AUTHORIZED for filing.

SEAN D. REYES
ATTORNEY GENERAL

/s/ Craig T. Peterson

CRAIG T. PETERSON
Assistant Utah Attorney General