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3RD DISTRICT COURT SALT LAKE COUNTY, STATE OF UTAH	
STATE OF UTAH, Plaintiff, vs. STEPHEN DANIEL CORD DOB: 05/13/1982 9605 N. 11600 W. Tremonton, UT 84337 Defendant.	INFORMATION (Warrant) Case No.: 231907496 Judge: Todd M. Shaughnessy

The undersigned, Special Agent S. Jensen, of the Utah Attorney General's Office, states on information and belief that the defendant, STEPHEN DANIEL CORD, 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: RETAIL THEFT, a Second Degree Felony, in violation of U.C.A. § 76-6-602, as follows: On or about March 22, 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 3: RETAIL THEFT, a Second Degree Felony, in violation of U.C.A. § 76-6-602, as follows: On or about May 5, 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 4: RETAIL THEFT, a Second Degree Felony, in violation of U.C.A. § 76-6-602, as follows: On or about December 2, 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 5: RETAIL THEFT, a Second Degree Felony, in violation of U.C.A. § 76-6-602, as follows: On or about February 24, 2023, 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 6: 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.

4. The owner of Doug's discovered that two of his employees, one of which is the defendant, utilized the company's "Point of sale system" to fraudulently credit themselves with in store credit and then subsequently use the fraudulent credit to make purchases in the store, to include purchasing firearms, ammunition, parts, and accessories.

5. In addition, defendant and the other employee have been hiding products in the back room (an area where employees can store personal items while at work), which they will then conceal inside of a backpack and walk away, without purchasing the item(s) as they leave. These acts were caught on a surveillance camera in the ceiling of the back room and the footage verifies that accessory thefts had taken place.

6. Defendant has been an employee with Doug's since 2020. On June 7, 2023, the owner noticed a case of Federal .223 ammunition, which had been ordered for defendant was removed from the backroom of the store. The owner checked defendant's records to see who had assisted with the ammunition purchase and Larsen could not find a transaction.

7. From March 1, 2021, to the present the defendant has made several dozen fraudulent transactions in which the defendant credited his customer account for nearly \$10,000. These fraudulent credits to defendant's account were all used to make full or partial payments towards the purchase of firearms, ammunition, optics, silencers, and other firearm accessories.

8. During that time period, the defendant purchased 27 firearms, 5 serialized gun parts (Receivers), and 2 silencers using fraudulent store credit entered in the company's point of sale system under the defendant's name, including, but not limited to: a PTR, model PTR-91, serial #GI22199, .308 Cal rifle, on 02/11/2022 for \$1,079.95; a PTR, model PTR200, serial #FC03335, 7.62x39 Cal rifle, on 03/22/2022 for \$1,288.31; a PTR, model PTR-91, serial #GI22986, .308 Cal rifle, on 05/05/2022 for \$914.90; a Grand Power, model Stribog, serial #SP9A3 GGS0461, 9mm pistol on 12/02/2022 for \$1,004.50; and Smith & Wesson, model 317, serial #DRK0664, .22 Cal revolver on 02/24/2023 for \$759.95.

9. The defendant also obtained dozens of non-serialized items, including ammunition, gun parts, optics, and other firearms accessories, which were either purchased in part or in whole using fraudulent store credit entered to the company's system, under defendant's account, or which were ordered in defendant's name and were not purchased and cannot be accounted for, that value of which is \$7863.47.

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 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 six 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