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3RD DISTRICT COURT SALT LAKE COUNTY, STATE OF UTAH	
STATE OF UTAH, Plaintiff, vs. JASON CHRISTOPHER HALL, Defendant.	DECLARATION OF THOMAS RUSSELL REGARDING PHOTOGRAPHING THE EXHIBITS Case No. 221906445 Judge: PAUL B. PARKER

Special Agent Thomas Russell hereby declares pursuant to U.C.A. § 78b-18a-101 et seq.
and under criminal penalty of perjury under the laws of Utah that:

1. I am a certified law enforcement officer in the state of Utah and have been certified for approximately 35 years. I am presently employed by the Utah Attorney General's Office and have been so employed since 2017.
2. I was originally assigned as investigator of the Jason Hall case in approximately November, 2021. one of
3. After the discovery was originally sent to the defense I was asked to retake the photographs of the alleged "threat letters" one of which I took with my normal assigned AG digital cam and we obtained new photos from Saratoga Springs evidence room of the other letters.

4. Subsequently I as advised the defense wanted to take their own. I was concerned about contamination, but after speaking with counsel we determined to put the exhibits on an easel, and I chose to a chair in front of the easel to prevent them from being closer than arm's length.
5. I have read the defendant's motion to compel and noted several inaccuracies. Mr. Wuthrich is the one who told me we had to accommodate their request contrary to their statement that "[s]tates agents were under orders from Mr. Wuthrich directly not to allow the defense counsel near the documents" (Def/ Motion to Compel, ¶5.). I'm sure I never stated such because I was the one opposing their examination, not Mr. Wuthrich. He actually facilitated the picture taking by coming up with the easel idea to alleviate my concerns about contamination if they stood over the documents.
6. I believe Saragota Springs followed a similar protocol. Defense counsel were allowed observe, photograph and view the documents for as long as they desired and take as many pictures as they wanted, but not to physically handle or stand over the exhibits.
7. The statement in footnote 1 of the defendant's motion to compel is misleading. We provided two sets of pictures, the second of which I considered high resolution. The camera the defense used did not appear to me to be any higher resolution than what I was using, but we did require they tell us who would take the pictures or with what camera. We simply sought to satisfy the defendant's request in a manner that would not be an opportunity for contamination of the evidence. I understood this was achieved, I never heard any complaint back until I read in the Motion to Compel the allegation they were not allowed "near" the documents. They were close enough they could have touched them, but I told them not to.

DATED: September 22, 2023

Signed this 22 day of September, 2023 at
5272 South College Drive, Murray Utah


/s/ Thomas Russell

Special Agent Thomas Russell

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing to be served on the
following via the court's e-filing system.

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Attorneys for Defendant

DATED: September __, 2023

/s/ Martina Hinojosa

MARTINA HINOJOSA

Paralegal