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Attorneys for Defendant

**IN THE THIRD JUDICIAL DISTRICT COURT
IN AND FOR SALT LAKE COUNTY, STATE OF UTAH**

STATE OF UTAH,

Plaintiff,

v.

JASON CHRISTOPHER HALL,

Defendant.

**DEFENDANT'S DISCOVERY
DISCLOSURES**

Case No: 221906445

Judge Paul B. Parker

Defendant Jason Christopher Hall (“**Defendant**” or “**Mr. Hall**”), through counsel, hereby provides his discovery disclosures as ordered by the Court to the State of Utah (the “**State**”) based on Utah Rules of Criminal Procedure 16(b)(1).

PRELIMINARY STATEMENT

These disclosures are based upon the information presently known and reasonably available to Mr. Hall. Mr. Hall makes these disclosures without waiving the right to supplement, delete, or modify them as further information is developed during his investigation or otherwise. As such, Mr. Hall does not represent that that he is identifying every document, tangible thing, or

witness possibly relevant to this action or his defenses in this matter. Rather, Defendant's disclosures represent a good-faith effort to identify information Mr. Hall presently believes is required to be disclosed based on the Court's order.

Mr. Hall will continue to collect documents related to this action and interview potential witnesses who may have information relevant to this action. Each of the following disclosures, therefore, is based on upon information presently known and available to Mr. Hall. Mr. Hall reserves the right to identify additional witnesses or documents that become known through his continuing investigation of this matter and/or that may pertain to claims and/or defenses that are hereafter asserted in this matter.

INITIAL DISCLOSURES

A. Possible Defense Witnesses

- a. Trial witnesses will be disclosed pursuant to Rule 16(b)(3) which will be "no later than 14 days, or as soon as practicable, before trial".

B. Documents

- See all documents, videos, recordings, data, items, and other evidence provided by the State in the Thirteen discovery disclosures.
- See all documents, videos, recordings, data, items, and other evidence provided to the Parties (the State and Mr. Hall) in the subpoena return from Bluffdale City.
- See all documents, videos, recordings, data, items, and other evidence provided to the Parties (the State and Mr. Hall) in the subpoena return from Nick Stidham via the Saratoga Springs Police Department.

- See all documents, videos, recordings, data, items, and other evidence provided to the Parties (the State and Mr. Hall) in the subpoena return from Nick Stidham via the Saratoga Springs Police Department.
- See all documents, videos, recordings, data, items, and other evidence provided to the Parties (the State and Mr. Hall) in the subpoena return from Jeff Gaston and Jazmine Beeny.
- See all documents, videos, recordings, data, items, and other evidence provided to the Parties (the State and Mr. Hall) in the subpoena return from Jeff Gaston and Jazmine Beeny.
- See all previously disclosed high-resolution photos taken by investigators for Mr. Hall.
- See business ownership documents related to Jeff Gaston that will produced to the State.
- Mr. Hall may use any documents obtained from third parties through subpoena during the investigation of this case.

DATED this 31st day of August, 2023.

ARMSTRONG TEASDALE LLP

/s/ Trinity Jordan
 Trinity Jordan
 Aaron B. Clark
 Jacob R. Lee
Attorneys for Defendant