

Scott L. Sackett II (11762)
scott@yahlaw.com
YOUNG HOFFMAN, LLC
175 South Main Street, Suite 850
Salt Lake City, Utah 84111
Telephone: (801) 359-1900
Attorneys for Plaintiff Jeffrey D. Gaston

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

JEFFREY D. GASTON

Plaintiff,

vs.

JASON HALL, an individual, NATALIE
HALL, an individual, GEORGE
SCHLIESSER, an individual, and
WOODCRAFT MILL & CABINET, INC.,
a Utah corporation,

Defendants.

FIRST AMENDED COMPLAINT

Case No. 230905528

Judge: Chelsea Koch

Tier: 3

Plaintiff Jeffrey D. Gaston (“Gaston”), by and through his counsel of record, Scott L. Sackett II of and for Young Hoffman, LLC, complains against defendants Jason Hall, Natalie Hall, George Schliesser, and Woodcraft Mill & Cabinet, Inc. and for causes of action allege as follows:

THE PARTIES

1. Jeffrey D. Gaston (“Gaston”) is an individual residing in Salt Lake County, State of Utah.
2. Jason Hall (“Mr. Hall”) is an individual residing in Salt Lake County, State of Utah.

3. Natalie Hall (“Mrs. Hall”) is an individual residing in Salt Lake County, State of Utah.

4. Defendant Woodcraft Mill & Cabinet, Inc. (“Woodcraft”) is a Utah corporation with its principal place of business in Salt Lake County, State of Utah.

5. Defendant George Schliesser (“Schleisser”) is a resident of the State of Utah.

JURISDICTION AND VENUE

6. This Court has jurisdiction over, and venue is proper in, this matter pursuant to Utah Code Ann. §§78A-5-102(1) and 78B-3-307.

7. This is a Tier 3 case pursuant to Rule 26 of the Utah Rules of Civil Procedure as Plaintiff’s claims for damages exceed \$300,000.

FACTS

8. Gaston was elected to public office in Bluffdale City (“Bluffdale”) as a member of the City Council and took office in January 2020.

9. At all times relevant hereto, Gaston has occupied the office of City Council Member.

10. In the fall or winter of 2020, Gaston decided to run for Mayor of Bluffdale.

11. In preparation for the Bluffdale mayoral election which would occur in November 2021, Gaston began fundraising efforts.

12. On March 5, 2021, Gaston received an e-mail from the address “cpacbluffdale@gmail.com”.

13. Gaston believed the e-mail was sent by a group of individuals forming a political

organization in Bluffdale.

14. The e-mail contained harassing and demeaning commentary toward Gaston such as the following:

- a. “You act like a schoolyard bully, not a statesman”;
- b. “You would be exposed as a fool”; and
- c. “you will be exposed as a freshman using childish tactics”.

15. The e-mail also contained threatening language stating “[i]n the meantime, you should know that the wheels are in motion to render you irrelevant”.

16. At the time the March 5, 2021, e-mail was received, Gaston was unaware of the identity of its author.

17. On March 8, 2021, an e-mail from “Bluffdale Citizens for Civility” was sent to the Bluffdale mayor, Bluffdale’s city manager and its city attorney, and members of its city council.

18. The e-mail contained various complaints related to Gaston, calling him a “man-child with massive insecurity issues” and “Bluffdale’s own little Donald Trump”.

19. The e-mail contained threatening comments stating that “Gaston needs to be reeled in,” and that Bluffdale needed to “stand up and be finished with this fool once and for all,” and “if he doesn’t get the hint, there is a group of us that are ready to move to the next phase.”

20. The threatening nature of the e-mail is further highlighted when the author states that if Gaston does what they demand, then “we can return to civil discourse.”

21. This e-mail was meant to intimidate and threaten Gaston.

22. The e-mail was not addressed to Gaston but was provided to him by Bluffdale's city attorney.

23. Gaston believed that Bluffdale Citizens for Civility was a group of individuals forming a political organization within Bluffdale.

24. At the time the March 8, 2021, e-mail was received and shared with Gaston, Gaston was unaware of the identity of its author.

25. On March 9, 2021, Gaston received a package at his home from an unidentified sender.

26. The package contained an anger management workbook for children.

27. The package also called Gaston an "imbecile" and ordered that he move from Bluffdale.

28. The package also contained death threats, demanding that Gaston kill himself or he would end up being killed.

29. The package contained statements informing Gaston that "this is your final warning. We are moving to the next phase. Do what we ask, or we will do what must be done."

30. The package and the threats contained therein caused Gaston significant fear for his safety and the safety of his family.

31. Gaston reasonably believed that someone was making active efforts to force him to forego his run for Mayor or he would be killed.

32. On March 9, 2021, a separate package from an unidentified sender was delivered to Bluffdale with "gag gifts" addressed to other council members of Bluffdale.

33. Gaston was also a named recipient of the “gag gifts.”
34. Each of the “gag gifts” received by the other Bluffdale council members was directed at Gaston.
35. Eventually, the package was given to law enforcement.
36. Law enforcement permitted Bluffdale council members to examine the package.
37. On March 24, 2021, while at a city council meeting, Gaston was handed a letter that had been received by the Bluffdale city clerk, addressed to Gaston.
38. The letter again contained death threats against Gaston, stating “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.”
39. The letter caused Gaston significant fear for his safety and the safety of his family.
40. The letter further promoted Gaston’s reasonable belief that someone was intending to cause Gaston significant bodily harm or death.
41. At the time Gaston received the March 24, 2021, letter, he was unaware of the identity of its author.
42. As a result of these threatening communications, and out of fear for the safety of his family, Gaston began having his domestic partner stay with her family when he would be absent from the home.
43. On approximately April 20, 2021, Gaston continued with his efforts to run for mayor, signing up for a time slot wherein potential candidates are interviewed.

44. Mrs. Hall signed up for the time slot immediately following Gaston.
45. On approximately April 30, 2021, Gaston attended his aforementioned interview as part of the process of running for Bluffdale mayor.
46. Mrs. Hall was in attendance at the interview location for the purpose of running for mayor, and saw Gaston leave his interview.
47. On June 14, 2021, Gaston received another e-mail communication from “cpacbluffdale@gmail.com”.
48. The e-mail specifically indicated that the author had heard that Gaston “interviewed to get money for a potential run for mayor.”
49. The e-mail also referenced the “gag gifts” that had been sent to Bluffdale city council, calling the sending of the gag gifts “Brilliant.”
50. The e-mail contained additional threatening communication, stating that Gaston would “be putting your house up for sale out of humiliation by the time we’re done.”
51. At the time the June 14, 2021, e-mail was received, Gaston did not know the identity of its author.
52. Based on the threats to his life and the continued hostile and threatening communications received, Gaston discontinued his campaign for mayor.
53. Gaston then began supporting Mrs. Hall’s opponent, John Roberts.
54. On July 20, 2021, Gaston received another e-mail communication from “cpacbluffdale@gmail.com”.
55. The July 20, 2021, e-mail contained additional harassing and demeaning

communications toward Gaston.

56. The July 20, 2021, e-mail referenced Gaston's support for Mrs. Hall's sole opponent for mayor and in relation to that support stated "Jesus Fucking Christ, you're an imbecile."

57. At the time the July 20, 2021, e-mail was received, Gaston had no knowledge of the identity of the author of the e-mail.

58. In August 2021, Gaston attended the Bluffdale Old West Days celebration ("OWD").

59. Gaston had rented a booth at OWD to promote Mr. Roberts' mayoral campaign.

60. Gaston had signs supporting Mr. Roberts' at his OWD booth.

61. Gaston's booth was proximate to the booth of Mrs. Hall.

62. Until arriving at OWD, Gaston was unaware that his booth would be adjacent to the booth of Mrs. Hall.

63. Gaston began unloading his vehicle and placing the signs up around his booth at OWD.

64. Once he began to place signs up on his booth, Gaston was approached by Mr. Hall.

65. Mr. Hall began to act erratic, cursing at Gaston, calling him "fucking pathetic."

66. Mr. Hall followed Gaston across the lawn of the OWD event as Gaston attempted to retreat from Mr. Hall.

67. As Mr. Hall followed Gaston, Mr. Hall picked up the signs placed by Gaston's

booth.

68. Gaston retreated to a point significantly removed from his booth and Mrs. Hall's

booth.

69. Despite Gaston's retreat, and without provocation, Mr. Hall attacked Gaston.

70. Mr. Hall threw Mr. Roberts' campaign signs at Gaston.

71. The signs thrown by Mr. Hall struck Gaston in the hands, arms, and face, leaving visible damage to Gaston.

72. Gaston immediately reported the incident to OWD staff, Bluffdale management, and police.

73. After the attack, Mr. Hall admitted to the attack and attempted to apologize for his actions.

74. Mr. Hall also indicated that the attack was the result of Gaston's communication to Bluffdale's city attorney regarding complaints received from citizens and city employees about Mrs. Hall.

75. Upon information and belief, Mrs. Hall was aware of Mr. Hall's intent to confront Gaston and was complicit with Mr. Hall's actions at OWD.

76. On November 2, 2021, Gaston received a package at his home containing a jester's hat and another demeaning letter.

77. The return address on the November 2, 2021, package was for an axe-throwing society.

78. Upon information and belief, this return address was placed on the package to

intimidate Gaston and cause him to fear for his personal safety.

79. On November 23, 2021, Gaston received a package at his home containing a letter with additional death threats, stating “Unfortunately [Gaston], you have shown 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.”

80. Gaston took the threats at face value.

81. As a result of the continuous threats to Gaston, he experienced constant fear that he would be harmed or killed, and that the same might occur to his family.

82. Gaston and his domestic partner, Jazmine Beeny, were constantly afraid to return to their home for fear that the threats would be carried out.

83. The severity of Gaston’s fear and emotional distress was based upon the content of the communications and packages, as well as the fact that the threats were not only delivered to Bluffdale City Hall, but also to Gaston’s personal residence.

84. In each of the instances of threatening communications received, Gaston informed law enforcement.

85. As a result of the communications and packages sent to Gaston, Gaston suffered extreme humiliation and estrangement from other council members and employees of Bluffdale.

86. Upon information and belief, each of the communications and packages described herein were packaged, created, or written by Defendants.

87. Upon information and belief, Mr. Hall is an owner or manager of Woodcraft.

88. At all times relevant hereto, Woodcraft was aware of the contents of the packages

and communications referenced herein.

89. Schliesser was an employee of Woodcraft.

90. Schliesser's sole relationship with Mr. Hall and Mrs. Hall was by virtue of his employment at Woodcraft.

91. As part of his employment with Woodcraft, Schliesser was charged with running errands, mailing packages, and delivering information on behalf of Woodcraft.

92. While employed by Woodcraft, and during his normal work hours, Schliesser was instructed by Woodcraft to deliver the packages and communications referenced herein.

93. Some of those packages were delivered to the post office by Schliesser.

94. Some of the packages were hand delivered by Schliesser to Gaston's residence.

95. Schliesser made each of the aforementioned deliveries at the direction of the other Defendants.

96. At all times relevant hereto, Schliesser was also aware of the content of the packages and communications directed and delivered to Gaston.

97. Schliesser hid his identity while making the aforementioned deliveries by, among other things, wearing oversized clothing, wearing a mask, obscuring his license plate, and paying for postage with cash.

98. Schliesser hid his identity at the instruction of the other Defendants.

99. At all times relevant hereto, Schliesser was paid by Woodcraft for the delivery of the packages and/or communications to Gaston.

100. In addition, one or more employees of Woodcraft engaged in the creation of, at

least in part, the above-referenced packages which were delivered to, or directed toward, Gaston.

101. Woodcraft's computers and software were used in the creation of the threatening communications to Gaston.

102. In approximately November 2021, law enforcement, through its investigation into the unlawful communications received by Gaston, connected Schliesser, Mr. Hall, and Mrs. Hall to the improper and unlawful communications and packages that were sent or directed to Gaston.

103. Upon learning that law enforcement had connected them to the unlawful threats and communications to Gaston, Defendants, upon information and belief, destroyed a Woodcraft computer used in the creation of those unlawful threats and communications.

104. Upon information and belief, the destruction of Woodcraft's computer was done to hide Defendants' unlawful conduct.

105. It was not until approximately November 2021, that Gaston learned that Mr. Hall, Mrs. Hall, Schliesser, and Woodcraft were behind the unlawful communications and packages.

106. Upon information and belief, at the very least, the March 5, 2021, and March 8, 2021, e-mails described herein were sent from Woodcraft's server.

107. In approximately July 2022, Mr. Hall was charged with various crimes related to unlawful conduct toward Gaston.

108. The charges were widely reported in various media outlets.

109. Defendants' actions caused such severe emotional distress to Gaston that, upon learning that, at the very least, Mr. Hall was responsible for the threatening communications, Gaston requested a police escort to future Bluffdale meetings.

110. On July 27, 2022, a Bluffdale city council meeting was held (the “Meeting”).
111. As part of his duties, Gaston was present at the Meeting.
112. Mrs. Hall, as mayor, was also present at the Meeting.
113. At the meeting multiple city residents demanded the resignation of Mrs. Hall based upon the unlawful conduct committed against Gaston during Mrs. Hall’s mayoral campaign.
114. Mrs. Hall refused to answer questions posed to her during the Meeting, and specifically indicated that the Meeting was not a place for her to provide commentary.
115. Despite her representations, once the comment period had closed and Bluffdale residents were no longer permitted to provide commentary, Mrs. Hall falsely denounced the allegations against Mr. Hall.
116. Mrs. Hall proceeded to state that the allegations against Mr. Hall were fabricated and were untrue.
117. Mrs. Hall proceeded to indicate that Mr. Hall never attacked Gaston.
118. These allegations cast a false light on Gaston, the witness and victim of Mr. Hall’s criminal conduct.
119. In fulfillment of his duties as a Council member, Gaston was present at the meeting.
120. The meeting was broadcast to the Bluffdale residents in attendance and online.
121. The meeting was also the subject of significant media coverage by various news outlets.

122. At all times relevant hereto, Gaston intended to pursue a career in politics.

123. The portrayal of Gaston in a false light by Mrs. Hall has significantly impeded Gaston's ability to continue that pursuit.

124. As of the date of this complaint, the criminal charges against Mr. Hall are pending, and no resolution with Gaston has been reached.

FIRST CAUSE OF ACTION
(Battery – Defendant Jason Hall)

125. Plaintiffs incorporate their allegations contained in Paragraphs 1 through 124 of the Complaint as though fully set forth herein.

126. As described more fully above, Mr. Hall deliberately and intentionally attacked Gaston at the Bluffdale Old West Days event, striking him with campaign signs.

127. Mr. Hall's striking of Gaston caused Gaston to suffer injury and was offensive to Gaston as a matter of law.

128. At all times relevant hereto, Mr. Hall's actions were willful and malicious, and manifested a knowing and reckless disregard toward and indifference to the rights of Gaston.

129. As a result of the battery occasioned upon Gaston by Mr. Hall, Gaston has suffered significant damage for which he seeks recovery, including damages for the emotional distress and mental anguish suffered as a result of the attack, the amount of which will be proved at trial.

130. Based on the foregoing, Gaston is entitled to judgment against Mr. Hall for battery in an amount to be determined at trial, plus pre- and post-judgment interest to the extent

permitted by law, and punitive damages.

SECOND CAUSE OF ACTION
(Civil Assault – All Defendants)

131. Plaintiff incorporates the allegations contained in Paragraphs 1 through 130 of the Complaint as though fully set forth herein.

132. Mr. Hall, through his conduct at Old West Days in the manner described above, intended to cause harmful or offensive contact with Gaston, or at the very least, intended to cause imminent apprehension of harmful or offensive conduct to Gaston.

133. As a result of Mr. Hall's actions, Gaston was put in imminent apprehension of harmful or offensive contact by Mr. Hall, at the Old West Days event.

134. Gaston suffered severe emotional distress and mental anguish as a result of the imminent apprehension of harmful or offensive contact by Mr. Hall at the Old West Days event.

135. Defendants, through the creation and delivery of the threatening communications described more fully above, intended to cause Gaston to suffer imminent apprehension of harmful contact or death.

136. Gaston, as a result of Defendants' conduct described herein, suffered imminent apprehension of significant bodily harm or death.

137. At all times relevant hereto, Defendants' actions were willful and malicious, or manifested a knowing and reckless indifference toward and disregard to the rights of Gaston.

138. Based on the imminent apprehension of significant bodily harm or death, Gaston suffered severe emotional distress and mental anguish.

139. Based on the foregoing, Gaston is entitled to judgment against Defendants for the assault occasioned upon him as described above, in an amount to be determined at trial, plus pre- and post-judgment interest to the extent permitted by law, and punitive damages.

THIRD CAUSE OF ACTION
(False Light- Defendant Natalie Hall)

140. Plaintiff incorporates the allegations contained in Paragraphs 1 through 139 of the Complaint as though fully set forth herein.

141. As described more fully above, on July 27, 2023, Mrs. Hall improperly and unlawfully portrayed Gaston in a false light, alleging, among other things, that Gaston had not suffered an attack by Mr. Hall at the Old West Days event, and claiming that the allegations of the threatening and demeaning communications sent by Mr. Hall to Gaston were untrue.

142. This unlawful portrayal of Gaston by Mrs. Hall occurred in a public forum, with numerous Bluffdale residents present, and was the subject of significant media coverage.

143. At all times relevant hereto, Mrs. Hall knew that her statements were false.

144. Mrs. Hall acted intentionally, and with actual malice in her portrayal of Gaston, giving the impression that Gaston was a liar and manipulator, and that the allegations that he was a victim of the crimes referenced herein, were false.

145. The false light in which Gaston was placed by Mrs. Hall is highly offensive to a reasonable person.

146. Based on Mrs. Hall's conduct described above, Gaston has suffered significant impacts to his political career, among other things, causing him to severe emotional distress.

147. At all times relevant hereto, Mrs. Hall's actions were willful and malicious, or manifested a knowing and reckless indifference toward and disregard to the rights of Gaston.

148. Based on the foregoing, Gaston is entitled to judgment against Mrs. Hall for his false light claim in an amount to be determined at trial, plus pre- and post-judgment interest to the extent permitted by law, and punitive damages.

FOURTH CAUSE OF ACTION
(Intentional Infliction of Emotional Distress – All Defendants)

149. Plaintiff incorporates the allegations set forth in Paragraphs 1 through 148 of the Complaint as though fully set forth herein.

150. Defendants' unlawful conduct described more fully above included, but is not limited to, harassment and intimidation of Gaston, portraying Gaston in a false light, committing battery against Gaston, and assaulting Gaston, including through the communication of numerous death threats directed to Gaston at both his public office as well as his home.

151. Defendants' conduct described herein is outrageous and intolerable and offends against the generally accepted standards of decency and morality as a matter of law.

152. Defendants did intend to cause, or acted in reckless disregard of the likelihood of causing, emotional distress to Gaston.

153. Any reasonable person would have known that Gaston would suffer emotional distress as a result of Defendants' conduct described herein.

154. As a result of Defendants' conduct described herein, Gaston did suffer severe emotional distress.

155. At all times relevant hereto, Defendants' actions were willful and malicious, or manifested a knowing and reckless indifference toward and disregard to the rights of Gaston.

156. Based on the foregoing, Gaston is entitled to judgment against Defendants for intentional infliction of emotional distress in an amount to be determined at trial, plus pre- and post-judgment interest to the extent permitted by law, and punitive damages.

FIFTH CAUSE OF ACTION
(Civil Conspiracy – All Defendants)

157. Plaintiff incorporates the allegations contained in Paragraphs 1 through 156 of the Complaint as though fully set forth herein.

158. At all times relevant hereto, Defendants acted in concert, one with another.

159. At all times relevant hereto, Defendants had a common objective to cause injury to Gaston in the manner described herein, which included but was not limited to, causing Gaston severe emotional distress and mental anguish.

160. Each of Defendants understood and agreed to the objective of causing injury to Gaston.

161. Each of Defendants understood and agreed to the conduct causing injury to Gaston, which included, but was not limited to, harassment and intimidation of Gaston, portrayal of Gaston in a false light, battery against Gaston, and assault which included death threats directed to Gaston.

162. At least one or more of Defendants did engage in conduct causing injury to Gaston in the manner described herein, including but not limited to, striking Gaston with

campaign signs, sending hostile and threatening communications to Gaston including death threats, and casting Gaston in a false light through a denial of his claims and alleging Mr. Hall's innocence and lack of involvement in any criminal conduct against Gaston, in a public forum.

163. As a result of Defendants' conduct, Gaston suffered damages, including but not limited to, severe emotional distress and mental anguish.

164. As a result of Defendants' conduct as described herein, Gaston did suffer injury, both physical and emotional, including severe emotional distress.

165. Based on the foregoing, Gaston is entitled to judgment against Defendants for civil conspiracy in an amount to be determined at trial, plus pre- and post-judgment interest to the extent permitted by law, and punitive damages.

PRAYER FOR RELIEF

WHEREFORE, having pled their claims for relief against Defendants, Plaintiff prays for judgment as follows:

1. ON THE FIRST CAUSE OF ACTION: for judgment against Jason Hall for battery in an amount to be determined at trial, plus pre- and post-judgment interest, and punitive damages.
2. ON THE SECOND CAUSE OF ACTION: for judgment against all Defendants for assault in an amount to be determined at trial, plus pre- and post-judgment interest, and punitive damages.
3. ON THE THIRD CAUSE OF ACTION: for judgment against Defendant Natalie Hall for her portrayal of Gaston in a false light in an amount to be determined at trial, plus

- pre- and post-judgment interest, and punitive damages.
4. ON THE FOURTH CAUSE OF ACTION: for judgment against all Defendants for damages suffered as a result of intentional infliction of emotional distress in an amount to be determined at trial, plus pre- and post-judgment interest, and punitive damages.
 5. ON THE FIFTH CAUSE OF ACTION: for judgment against all Defendants for civil conspiracy in an amount to be determined at trial, plus pre- and post-judgment interest, and punitive damages.
 6. For attorneys' fees and costs to the extent permitted by Utah law.
 7. For all other relief that this Court deems just and proper.

DATED this 27th day of July, 2023.

YOUNG HOFFMAN, LLC

By /s/ Scott L Sackett II
Scott L. Sackett II
Attorneys for Plaintiff Jeffrey D. Gaston