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

JEFFREY D. GASTON; Plaintiff, vs. JASON HALL, et al.; Defendant.	Case No. 230905528 **ANSWER TO SECOND AMENDED COMPLAINT** (JURY TRIAL REQUESTED) Hon. Judge Chelsea Koch

COMES NOW Defendants Jason Hall, Natalie Hall and Woodcraft Mill & Cabinet ("Defendants"), by and through counsel undersigned, hereby answers Plaintiff's Second Amended Complaint as follows.

I. ANSWER

FIRST DEFENSE

Defendants respond to the numbered paragraphs of the Claims as follows (headings below correspond to the headings found in the Claims):

1. Admit.

2. Admit.

3. Admit.

4. Admit.

5. Defendants are without information sufficient to admit or deny, and therefore deny.

6. Admit.

GENERAL ALLEGATIONS

7. Admit.

8. Admit.

9. Admit.

10. Deny.

11. Deny.

12. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

13. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

14. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

15. Defendants admit the content of the email but deny the characterization of it.

16. Defendants admit the content of the email but deny the characterization of it as threatening.

17. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

18. Deny.

19. Admit.

20. Admit.

21. Defendants admit the content of the email but deny the characterization of it as threatening.

22. Admit.

23. Deny.

24. Defendants admit the content of the email but deny the characterization of it as threatening.

25. Deny.

26. Admit.

27. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

28. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

29. Admit.

30. Admit.

31. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

32. Deny.

33. Deny.

34. Deny.

35. Deny.

36. Deny.

37. Admit.

38. Admit.

39. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

40. Deny.

41. Admit.

42. Admit.

43. Admit.

44. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same, but deny any implication that Defendants were responsible for this letter.

45. Deny.

46. Deny.

47. Deny.

48. Deny.

49. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

50. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

51. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

52. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

53. Admit.

54. Admit.

55. Admit.

56. Admit.

57. Defendants admit the content of the email but deny the characterization of it as threatening.

58. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

59. Deny.

60. Deny.

61. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

62. Admit.

63. Deny.

64. Admit.

65. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

66. Deny.

67. Admit.

68. Admit.

69. Admit.

70. Admit. Defendants believe Gaston placed his booth intentionally to interfere with visibility of Mrs. Hall's signage.

71. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

72. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

73. Deny.

74. Deny.

75. Deny.

76. Deny.

77. Deny.

78. Deny.

79. Deny.

80. Deny.

81. Deny.

82. Deny.

83. Deny.

84. Deny.

85. Admit.

86. Admit.

87. Deny.

88. Deny.

89. Deny. Defendants assert that the City Manager wanted Mrs. Hall to go back to work after the election was over, and before the results were certified.

90. Defendants object to the paragraphs characterization of the what the ordinance allowed and why there was a vote, but otherwise admit. Defendants assert the election had already taken place on this date.

91. Defendants admit Gaston received a package, but deny it contained any letter.

92. Deny.

93. Deny.

94. Deny.

95. Deny.

96. Deny.

97. Deny.

98. Mr. Hall admits sending the referenced packages. Defendants deny that the packages contained any threat, deny Plaintiff's characterization of its contents, and deny the remaining allegations of the paragraph.

99. Admit.

100. Deny.

101. Admit.

102. Defendants deny Mr. Schliesser had any working relationship through Woodcraft with Mrs. Hall. Defendants deny Mr. Hall's sole relationship with Mr. Schliesser was through work, and assert the two were friends.

103. Deny.

104. Defendant Jason Hall admit asking Schilesser to deliver the packages as a personal favor, but denies other Defendants had any knowledge of it or that this was part of Mr. Schliesser's employment duties.

105. Admit.

106. Admit.

107. Deny.

108. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

109. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

110. Deny.

111. Deny.

112. Deny.

113. Deny.

114. Defendants deny that Mrs. Hall ever was connected to the packages or had knowledge of them. Defendants admit there was an investigation. Otherwise admit.

115. Deny.

116. Admit.

117. Deny.

118. Deny.

119. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

120. Deny. Defendants believe the emails were sent using Gmail servers.

121. Admit.

122. Admit.

123. Deny.

124. Deny.

125. Mrs. Hall admits making a social media post on or about July 6, 2022, and refers to the post for its complete contents. Defendants deny that the post is accurately or completely characterized in the paragraph, deny that any statement in it was false, and deny the remaining allegations.

126. Admit.

127. Deny.

128. Deny.

129. Deny.

130. Deny.

131. Admit.

132. Defendants admit Gaston was present, but otherwise deny.

133. Admit.

134. Admit.

135. Admit.

136. Deny.

137. Admit.

138. Admit.

139. Deny.

140. Defendants admit Gaston was present, but otherwise deny.

141. Defendants admit the meeting was available through streaming services, but otherwise deny.

142. Admit.

143. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

144. Deny.

145. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

146. Admit.

147. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

148. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

149. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

150. Deny.

151. Deny.

152. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

153. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

154. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

155. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

156. Deny.

157. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

158. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

159. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

160. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

161. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

162. Deny.

163. Deny.

164. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

165. Deny.

166. Deny.

167. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

168. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

169. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

170. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

171. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

172. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

173. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

174. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

175. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

176. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

177. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

178. Defendants admit that Schliesser was employed by Woodcraft, but otherwise deny.

179. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

180. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

181. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

182. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

183. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

184. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

185. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

186. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

187. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

188. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

189. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

190. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

191. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

192. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

193. Admit.

194. Admit.

195. Admit.

196. Deny.

197. Admit.

198. Admit.

199. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

200. Deny.

201. Deny.

202. Deny.

203. Deny.

204. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

205. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

206. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

207. Admit.

208. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

209. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

210. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

211. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

212. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

213. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

214. Deny.

215. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

216. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

217. Defendants incorporate their answers above.

218. Deny.

219. Deny.

220. Deny.

221. Deny.

222. Deny.

223. Defendants incorporate their answers above.

224. Deny.

225. Deny.

226. Deny.

227. Deny.

228. Deny.

229. Deny.

230. Deny.

231. Deny.

232. Deny.

233. Deny.

234. Deny.

235. Defendants incorporate their answers above.

236. Mrs. Hall admits making a social media post on or about July 6, 2022, and refers to the post for its complete contents. Defendants deny that the post is accurately or completely characterized in the paragraph, deny that any statement in it was false, and deny the remaining allegations."

237. Admit.

238. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

239. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

240. Admit.

241. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

242. Mrs. Hall admits making a social media post on or about July 6, 2022, and refers to the post for its complete contents. Defendants deny that the post is accurately or completely characterized in the paragraph, deny that any statement in it was false, and deny the remaining allegations.

243. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

244. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

245. Deny.

246. Deny.

247. Deny.

248. Admit.

249. Deny.

250. Defendants are without information sufficient to admit or deny the allegations and therefore deny the same.

251. Deny.

252. Deny.

253. Deny.

254. Deny.

255. Defendants incorporate their answers above.

256. Deny.

257. Deny.

258. Deny.

259. Deny.

260. Deny.

261. Deny.

262. Deny.

263. Defendants incorporate their answers above.

264. Deny.

265. Deny.

266. Deny.

267. Deny.

268. Deny.

269. Deny.

270. Deny.

Any other allegations are denied.

AFFIRMATIVE DEFENSES

SECOND DEFENSE

The Complaint fails to state a claim upon which relief can be granted.

THIRD DEFENSE

Plaintiff has failed to mitigate his damages.

FOURTH DEFENSE

Plaintiff's claims fail for unclean hands and other equitable considerations, including representations Plaintiff may have previously made falsely representing facts contradicting factual assertions made herein.

FIFTH DEFENSE

Plaintiff's claims are barred in whole or in part because statements of Defendants constitute statements of opinion.

SIXTH DEFENSE

Defendants reserve the right to assert additional affirmative defenses which may become known.

SEVENTH DEFENSE

Plaintiff's claims are barred by the doctrines of waiver, laches, and estoppel.

EIGHTH DEFENSE

Plaintiff's claims are barred because Plaintiff has not suffered any damages.

NINTH DEFENSE

Plaintiff's claims are barred to the extent that Defendants' conduct is not outrageous or intolerable.

TENTH DEFENSE

Plaintiff's claims are barred as Plaintiff's injuries, if any, were a foreseeable result of Plaintiff's conduct, and caused by Plaintiff's own misconduct.

ELEVENTH DEFENSE

Plaintiff's claims are barred as Plaintiff has suffered no illness or bodily harm.

TWELFTH DEFENSE

Plaintiff's claims are barred to the extent they are subject to administrative process requirements.

THIRTEENTH DEFENSE

Plaintiff's claims are barred to the extent that Plaintiff incurred no damage as a result of Defendants' purported conduct.

FOURTEENTH DEFENSE

Plaintiff's claims are barred to the extent that the alleged conduct that forms the basis thereof was lawful and protected by free speech.

FIFTEENTH DEFENSE

Plaintiff's claims are barred to the extent that damages were caused by third parties over whom Defendants had no control.

SIXTEENTH DEFENSE

Plaintiff's claims are barred to the extent that the alleged conduct that forms the basis thereof was not made with actual malice.

SEVENTEENTH DEFENSE

Plaintiff's claims are barred to the extent that statements made by Defendants were an exercise of their right of freedom of speech on a matter of public concern.

EIGHTEENTH DEFENSE

Plaintiff's claims are barred, in whole or in part, by the applicable statutes of limitations, including but not limited to Utah Code § 78B-2-302.

NINETEENTH DEFENSE

Plaintiff's claims against Mrs. Hall are barred, in whole or in part, by Plaintiff's failure to comply with the notice of claim requirements of the Governmental Immunity Act of Utah, Utah Code § 63G-7-401, including the failure of Plaintiff's notice of claim to identify Mrs. Hall as an employee against whom a claim is being pursued, as required by Utah Code § 63G-7-401(3)(a)(iv) and as found by this Court in its May 13, 2024 Order.

TWENTIETH DEFENSE

Plaintiff's claims against Mrs. Hall are barred, in whole or in part, by the Governmental Immunity Act of Utah, including the exclusive remedy and limitation of personal liability provisions of Utah Code § 63G-7-202(3), because the conduct alleged occurred during the performance of Mrs. Hall's duties, within the scope of her employment, or under color of authority.

TWENTY-FIRST DEFENSE

This Court lacks subject matter jurisdiction over Plaintiff's claims against Mrs. Hall to the extent Plaintiff failed to comply with the requirements of the Governmental Immunity Act of Utah.

TWENTY-SECOND DEFENSE

Plaintiff's claims are barred, in whole or in part, by the doctrines of res judicata, collateral estoppel, and law of the case, including the preclusive effect of this Court's May 13, 2024 Order Granting Bluffdale City's Motion to Dismiss with Prejudice.

JURY TRIAL REQUESTED

Defendants request and demand a jury trial on claims and facts.

II. COUNTERCLAIMS AND THIRD-PARTY CLAIMS

Defendants reassert and maintain the Counterclaims and Third-Party claims as previously filed and in the litigation posture existing prior to filing this Answer to the Second Amended Complaint (these Counterclaims and Third-Party Claims manifest by **Exhibit A** hereto).

DATED AND SIGNED this 1st day of July, 2026.

/s/

STEVEN L. RINEHART

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of July, 2026, a true and correct copy of the foregoing ANSWER was served on the following person(s) indicated below:

All attorneys of record	_____ US Mail, Postage Prepaid _____ Facsimile _____ Hand-Delivery _____ Federal Express __X__ Electronically

/s/ Steven Rinehart

Steven Rinehart

Exhibit A

Trinity Jordan (15875)
Lyndon R. Bradshaw (15097)
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Attorneys for Jason Hall, Natalie Hall, & Woodcraft Mill & Cabinet Inc.

If you do not respond to this document within applicable time limits, judgment could be entered against you as requested.

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

JEFFREY D. GASTON, Gaston, v. JASON HALL, an individual; NATALIE HALL, an individual; GEORGE SCHLIESSER, an individual; and WOODCRAFT MILL & CABINET INC., a Utah corporation, Defendants.	**HALL DEFENDANTS' COUNTERCLAIM AND THIRD-PARTY COMPLAINT** Case No: 230905528 Judge Chelsea Koch **TIER 3**
AND RELATED COUNTERCLAIM AND THIRD-PARTY COMPLAINT	

COUNTERCLAIM AND THIRD-PARTY COMPLAINT

Pursuant to Rules 8, 13, and 14 of the Utah Rules of Civil Procedure, Defendants Jason Hall and Natalie Hall (collectively, "**Hall Defendants**" or "**Counterclaimants**"), assert this Counterclaim against Plaintiff Jeffrey D. Gaston and Third-Party Complaint against Connie Pavlakis and Connie Robbins (collectively with Mr. Gaston, "**Counterclaim Defendants**"), making the following claims and allegations. The Counterclaim and Third-Party Complaint are

collectively referred to as the "**Counterclaim**."

INTRODUCTION

The Hall Defendants bring this Counterclaim seeking justice for the false and damaging narrative propounded against them by Counterclaim Defendants. Jeffrey Gaston, along with his co-conspirators, Connie Pavlakis and Connie Robbins, wove a web of deception that included falsely reporting to police that Mr. Gaston was the victim of death threats and a physical assault at the hands of Counterclaimant Jason Hall, all in a desperate attempt to salvage Mr. Gaston's political reputation and exact revenge on Mr. Gaston's political adversaries.

Mr. Gaston was elected to the Bluffdale City Council in November 2019. By early Spring of 2020, just a few months into office, the first-time city council member had accumulated a growing list of people who Mr. Gaston wanted out of City Hall, which included the Mayor, the City Manager, the City Attorney, the Administrative Services Director, City Council members, and a number of part-time employees. Mr. Gaston was quickly adopted into a small group of Bluffdale residents, led by Ms. Pavlakis and Ms. Robbins, that were diametrically opposed to these public figures and employees.

One of the part-time employees on Mr. Gaston's list was Counterclaimant Natalie Hall, who at the time was the City's Emergency Preparedness Manager who also ran the City's social media. In early 2020, Ms. Hall began contemplating running for Mayor, and word of this got around to Mr. Gaston, Ms. Pavlakis, and Ms. Robbins. By July 2020, two anonymous letters were sent to City officials, smearing Ms. Hall—one letter alleging that she was having an inappropriate relationship with the City Manager. In December 2020, Ms. Hall met with Mr. Gaston and told him she was running for Mayor in 2021. He responded by berating her about the decision, suggesting she and her family would be dragged through the mud, and indicating that he was going

to support an opponent. In January 2021, Mr. Gaston brought the inappropriate relationship accusation letter to a fellow City Council member, suggesting that the other City Council member officially bring it to the attention of the City. When the City Council member refused because the letter was baseless, Mr. Gaston snapped back, "I don't care if it's true or not."

In early 2021, Ms. Hall's husband, Jason Hall, began to express frustration with Mr. Gaston's antics. Between March and July, Mr. Hall sent three anonymous emails to Mr. Gaston criticizing his decorum and political conduct. Mr. Hall, notorious for practical jokes and gag gifts, also sent Mr. Gaston an anger management coloring book and sent City Hall diapers and binkies, among other items, poking fun at Mr. Gaston's conduct. On November 2, 2021, Ms. Hall won the Bluffdale mayoral election. The next day, Mr. Hall anonymously sent Mr. Gaston a jester hat in celebration of Ms. Hall's victory over Mr. Gaston's favored candidate. This apparently incensed Mr. Gaston. On November 4, 2021, with the help of a local police officer, Mr. Gaston identified the sender of the gag gifts.

On November 8, 2021, Mr. Gaston filed a lengthy statement to police, claiming: (1) that he was assaulted by Mr. Hall at a Bluffdale event during the Summer, (2) that he received death threats sent by Mr. Hall, and (3) that he had been fearing for his life since June 14, 2021. Mr. Gaston's elaborate story was that he received death threats in the form of three letters. He claimed that the first letter was sent to his home on March 9, 2021, along with the coloring book Mr. Hall actually sent to Mr. Gaston. He claimed the second letter was mailed to City Hall on March 11, 2021. Once the criminal investigation started, Mr. Gaston later claimed that the third letter was sent to his house on November 23, 2021. Mr. Gaston went so far as to create falsified physical evidence to ensure his story was believed, which he then turned over to the police, including the alleged threat letters. Hook, line, and sinker, the police brought the case to the Utah Attorney General's office,

who then criminally charged Mr. Hall on June 30, 2022 based largely (if not entirely) on the evidence falsified by Mr. Gaston.

Mr. Hall was forced to hire defense counsel, at which point he began to dismantle Mr. Gaston's fabricated narrative and manufactured evidence. Mr. Hall first submitted himself to a polygraph and requested Mr. Gaston to do the same. Mr. Hall passed the polygraph, denying any involvement. Mr. Gaston refused to take a polygraph. Mr. Hall hired a forensic document examiner, who found that the ink on the threat letters did not match any of the printers in Mr. Hall's home or office. Mr. Hall also found numerous inconsistencies with Mr. Gaston's story. But the most damning part of the investigation was the vast number of people who knew Mr. Gaston that said he has a propensity for misrepresentation and is willing to go after anybody that crosses him.

Mr. Gaston's carefully crafted story, repeated to police, the media, and in the allegations before this Court, is no trivial matter. It represents a weaponization of the justice system against the Hall Defendants, causing their family severe reputational harm, emotional distress, and financial loss in their efforts to defend themselves for the last three years. The claims alleged herein hold Mr. Gaston and his co-conspirators responsible for their wrongful conduct.

JURISDICTION AND VENUE

1. Jason Hall ("**Mr. Hall**) is an individual residing in Salt Lake County, State of Utah.

2. Natalie Hall ("**Ms. Hall**) is an individual residing in Salt Lake County, Utah.

3. Jeffrey D. Gaston ("**Mr. Gaston**") is an individual residing in Salt Lake County, Utah.

4. Connie Pavlakis ("**Ms. Pavlakis**") is an individual residing in Salt Lake County, Utah.

5. Connie Robbins ("**Ms. Robbins**") is an individual residing in Salt Lake County,

Utah.

6. The acts complained herein occurred in Salt Lake County.

7. Jurisdiction and venue are proper in this Court pursuant to Utah Code §§ 78A-5-102, 78B-3a-102, 78B-3a-104, and 78B-3a-201.

8. This is a Tier 3 action pursuant to Rule 26(c) of the Utah Rules of Civil Procedure because Counterclaimants' damages exceed $300,000.

GENERAL ALLEGATIONS

Mr. Gaston's campaign for Bluffdale City Council

9. In 2018, soon after graduating college, Mr. Gaston moved to the small city of Bluffdale, Utah, and a year later, Mr. Gaston ran for Bluffdale City Council.

10. During his campaign, Bluffdale residents got to know Mr. Gaston well after he hired a high-powered political consulting firm and outspent his opponents by a wide margin.

11. Months into the campaign season, another candidate for Bluffdale City Council, Mark Hales, posted a link to a local podcast on his own Facebook page and the Bluffdale City Facebook page, casting some doubt as to Mr. Gaston's character.

12. In November 2019, both Mr. Gaston and Mark Hales won seats on the Bluffdale City Council.

Mr. Gaston's reputation as council member

13. During his tenure, Mr. Gaston had a few political allies, including one notable ally named Connie Pavlakis, who began to mentor Mr. Gaston, and her friend, Connie Robbins.

14. Ms. Pavlakis had volunteered with the City on the City Planning Commission and planning the City's "Old West Days," with the help of Ms. Robbins.

15. Over the years, Ms. Pavlakis mentioned to City Council members that she was

owed a staff position with the City, stating: "I'm the only woman that's qualified to be a department head."

16. Eventually, Ms. Pavlakis pushed for a paid position with Bluffdale, and in 2019, the City hired her as "Events Coordinator."

17. Once Mr. Gaston took office, City staff began to report that Mr. Gaston would regularly call City employees and direct them to do certain things, such as prioritizing certain business licenses over others, referring to himself as their "boss."

18. Based on Mr. Gaston's reported strong-arming of City employees, the City Attorney, Todd Sheeran, was forced to tell City staff that they were not to speak with Mr. Gaston unless the City Attorney was present.

19. Mr. Gaston quickly gained a reputation for being narcissistic, defensive, and at times, combative. These characteristics reared their ugly head when anyone challenged him. Mr. Gaston had an overblown sense of his own importance and anyone that got in the way became a target.

20. Early on, Natalie Hall became one of those targets, and later, she and her family became *the* target.

21. Ms. Hall had been working for the City since 2014 when she was hired as a part-time Emergency Manager.

22. Over the years, the City asked Ms. Hall to shoulder additional projects, starting with organizing the Miss Bluffdale Pageant, rebranding the City Logo, and constructing the City website.

23. Ms. Hall was later asked to take on larger roles, taking over Business Licensing and becoming the City's Public Information Officer, managing all communications from the City

including the City's newsletters and social media.

24. Despite the fact that Ms. Hall was slowly becoming a key member of the City staff, she continued as a part-time employee working part-time hours.

25. Mr. Gaston and Ms. Pavlakis took issue with Ms. Hall's management over the City's communications, particularly when it came to social media.

26. On one occasion, Ms. Pavlakis tried to persuade Ms. Hall to give her the City's Facebook login so she could post her own content regarding events, such as Old West Days.

27. Ms. Hall declined the request and explained that all City communications were supposed to go through a program that schedules and pushes messages to all social media platforms, and those messages would need to go through Ms. Hall.

28. Ms. Pavlakis was frustrated to be denied full control, and shortly afterward, she circumvented City protocol by creating her own site just for Old West Days.

29. On another occasion, Mr. Gaston approached Ms. Hall, asking for the City's Facebook login so that he could make his own posts.

30. Ms. Hall explained that, pursuant to Bluffdale City policy, and as later confirmed by other City staff, all posts must come from the City Council collectively and not from individual council members, and those messages would need to go through the scheduling program and through Ms. Hall .

31. Mr. Gaston became angry that a part-time city employee would dare deny him unfettered access to post whatever he wanted purportedly on behalf of the City.

Ms. Hall plans to run for Mayor

32. In early 2020, Ms. Hall began contemplating running for Mayor and started discussing this possibility with some other City staff members.

33. This idea infuriated Mr. Gaston, Ms. Pavlakis, and Ms. Robbins. Mr. Gaston could not stomach having to work with Ms. Hall that closely, and neither could Ms. Pavlakis and Ms. Robbins, who—if Ms. Hall were elected—would have to answer to Ms. Hall in planning City events.

34. Ms. Hall's potential candidacy spurred the three into action as they began conspiring to prevent Ms. Hall from winning the election, starting with a smear campaign.

35. Around this time, Mr. Gaston attempted to change Bluffdale City policy, requiring that no City employee could run for office for four years after the termination of their employment, however, this effort failed.

Smear No. 1 – Favoritism

36. In July 2020, a citizen requesting to be kept anonymous showed up at the residence of Council Member Wendy Aston and gave her a letter accusing Ms. Hall of being the recipient of favoritism, claiming that her wage as a part-time employee was too high.

37. The letter asserted, more specifically, that Ms. Hall's compensation had gone up at a rate faster than the compensation of her predecessor.

38. Eventually, the author of the letter was determined to be Connie Robbins, who had made these claims despite the fact that she was not a City employee and did not have access to any proper description of Ms. Hall's responsibilities nor City employment records, which suggests that she had the help of other people employed by the City.

39. Around this time, somehow armed with a copy of the same anonymized letter, Mr. Gaston approached Ms. Aston and suggested that she bring the letter to the City's attention so that it could start an investigation.

40. Soon after this suggestion, Ms. Aston turned the letter over to the City Attorney,

Todd Sheeran, who out of abundance of caution recommended the City hire outside counsel to investigate the accusation.

41. After a thorough investigation, outside counsel provided a report that indicated there was no evidence of favoritism.

42. To the contrary, Ms. Hall's responsibilities were so numerous that the report found Ms. Hall was *underpaid*, stating that she was "a bargain" for the City.

Smear No. 2 – Inappropriate Relationship

43. Only days after the letter alleging favoritism was delivered to Ms. Aston, another letter was hand-delivered to Ms. Aston, again at her home, and again the source of the letter requested to be kept anonymous.

44. This time, the anonymized letter ratcheted up the attacks. The source, who claimed to be a City employee, asserted that Ms. Hall and the City Manager, Mark Reid, were having an inappropriate relationship, and that this somehow served as the basis for Ms. Hall's rise in wage and responsibility.

45. Ms. Aston found the letter to be so meritless that she declined to take any further steps that would propagate the false claims.

46. Months later, in December 2020, Ms. Hall officially decided to run for Mayor, and planned to publicly announce her candidacy a few months down the road.

47. As part of her decision, Ms. Hall met with each City Council member, the current Mayor, and the City Manager to inform them of her intention to run. Each wished her luck and offered encouragement, with the exception of Mr. Gaston.

48. In her meeting with Mr. Gaston, he told her that she would not be a good fit, that he would be supporting an opponent, and warned Ms. Hall that if she ran for Mayor, her reputation

and the reputation of her family would be dragged through the mud.

49. One month later, in January 2021, Mr. Gaston brought the second anonymized letter to Ms. Aston and suggested that they bring the letter to the attention of the City.

50. Ms. Aston expressed her disagreement with this idea and attempted to talk Mr. Gaston out of it, stating that it was a baseless accusation.

51. In a fit of anger, Mr. Gaston responded, "**I don't care if it's true or not**."

52. This disregard for the truth reminded Ms. Aston of a prior conversation she had with Mr. Gaston where he told her **he would ruin someone else's life to get what he wanted**.

53. Soon after this conversation, Bluffdale Mayor Derk Timothy was made aware that this letter had surfaced and that Mr. Gaston was planning to weaponize the accusation letter by making it public ahead of Ms. Hall announcing her intent to run for mayor.

54. Mayor Timothy immediately informed the City Manager, Mark Reid.

55. Mr. Reid and his wife then called Mr. and Ms. Hall to inform them.

56. The four then approached the City Attorney and asked for an investigation to clear the allegations.

57. Mayor Timothy performed an investigation and found no evidence to substantiate the claims, determining that the allegations were unfounded and false.

58. This letter was eventually revealed to be authored and delivered by Connie Pavlakis.

Smear No. 3 – Campaigning on City Time

59. In April 2021, Ms. Hall and a number of other City staff were sent to St. George to attend the League of Cities and Towns Conference, which offered training to city staff and elected officials.

60. After the conference, Mr. Gaston overheard Traci Crockett, another City Council Member who also attended the conference, state that an official from a different city had asked Ms. Hall if the rumor was true that she was going to run for Mayor, which Ms. Hall confirmed.

61. Overhearing that one sentence, Mr. Gaston leveled yet another baseless claim against Ms. Hall, asserting this time that she was actively campaigning on "City time."

62. Mr. Gaston demanded another investigation into the allegation.

63. Again, the City hired outside counsel, who conducted a thorough investigation, which found the accusation to be baseless.

64. Despite the three investigations' findings, Mr. Gaston used the existence of the investigations to his benefit and to Ms. Hall's detriment, repeatedly telling people that Ms. Hall was "under investigation."

65. All three of these attacks on Ms. Hall's character were a coordinated effort by Mr. Gaston, Ms. Pavlakis, and Ms. Robbins to damage Ms. Hall's personal reputation, the reputation of the Hall family, and Ms. Hall's chances of being elected Bluffdale's Mayor.

Mr. Gaston's rant at City Council meeting

66. Mr. Gaston's divisive antics came into full display at a City Council meeting on February 24, 2021, where the City considered a certain land use proposal.

67. Those behind the proposal asked the City for a zoning change to allow for a transitional zone of a "55+" community in between one-acre lots and full commercial.

68. At the City Council meeting, after some discussion on the topic, Mayor Timothy pointed out that earlier, Mr. Gaston had on his own, invited someone up to speak to the Council, but then later told another Council Member that she could not do the same.

69. This was not some grand allegation, but Mr. Gaston took it as one.

70. In a childish rant, Mr. Gaston scolded Mayor Timothy, telling him he was "out of line," pointing his finger repeatedly, stating, "Do not *ever* question my integrity."

71. Mr. Gaston then moved to go into a closed-door meeting. The City Attorney asked for the reason for the motion, but before he could finish asking the question, Mr. Gaston turned to the audience and stated, among other things: "This is an embarrassment of a city."

72. The City Attorney again asked Mr. Gaston for the reason for the motion, and Mr. Gaston stated, "For the character, and professional incompetence, and health of an individual," turning in the direction of Mayor Timothy.

73. After the zoning measure passed, before the meeting adjourned, Mr. Gaston slammed shut his briefcase and stormed out of the room.

74. Later, behind closed doors, staff overheard Mr. Gaston yelling at Mayor Timothy, threatening to sue him over Mr. Gaston's perceived slights.

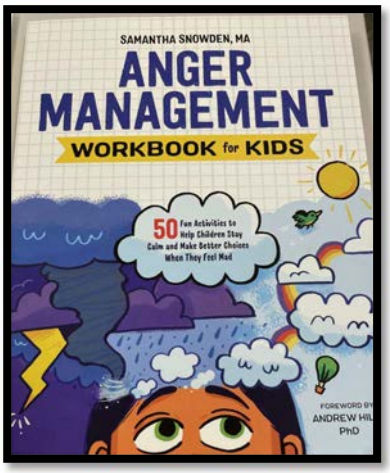
Mr. Gaston is Confronted about His Behavior

75. Around this time, Mr. Hall grew tired of watching Mr. Gaston humiliate his wife, other hard-working City employees, and the rest of the City.

76. On March 5, 2021, Mr. Hall sent an anonymous email to Mr. Gaston, chiding Mr. Gaston for his childish behavior and bullying tactics.

77. In response, Mr. Gaston reported the email to Sgt. Zach Robinson with Bluffdale Police.

78. On March 9, 2021, Mr. Hall, who occasionally enjoys pranks, practical jokes, and sending gag gifts, sent a children's anger management coloring book to Mr. Gaston's home with a typed note ("Hall Note No. 1") that read: "I hope this helps with your issues, buddy."



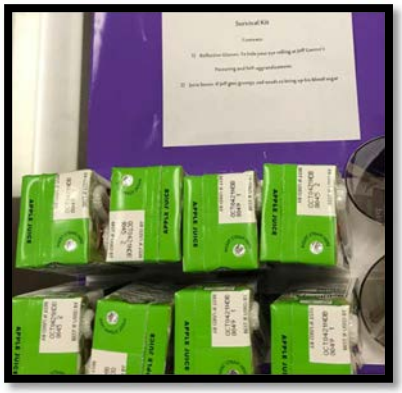
79. Mr. Gaston did not report this coloring book to police at the time.

80. On March 10, 2021, Mr. Hall sent an email to Mayor Timothy, the City Council (excluding Mr. Gaston), and the City Manager, pointing out Mr. Gaston's childish behavior in the recent City Council meeting, encouraging them to stand up to Mr. Gaston's bullying tactics.

81. Once Mr. Gaston received a forwarded copy of this email, he quickly forwarded it to Sgt. Robinson.

82. On the same day, Mr. Hall asked one of his employees to anonymously deliver a package of gag gifts to City Council members at City Hall.

83. The package, labeled "City Council Survival Kit," contained items like binkies, bottles, pull-up diapers, and instructions on how to use the contents should Mr. Gaston have another meltdown in a City Council meeting.



84. The gag gifts infuriated Mr. Gaston, as they were a clear criticism of his behavior at the previous City Council meeting. As Mr. Gaston arrived at City Hall and saw the gag gifts, he flew into a rage, scooped up the gifts, and quickly took them to the police station, demanding the gifts be photographed as evidence.

85. Police took photographs of the items, but then returned the items to the City, determining that no crime had been committed.

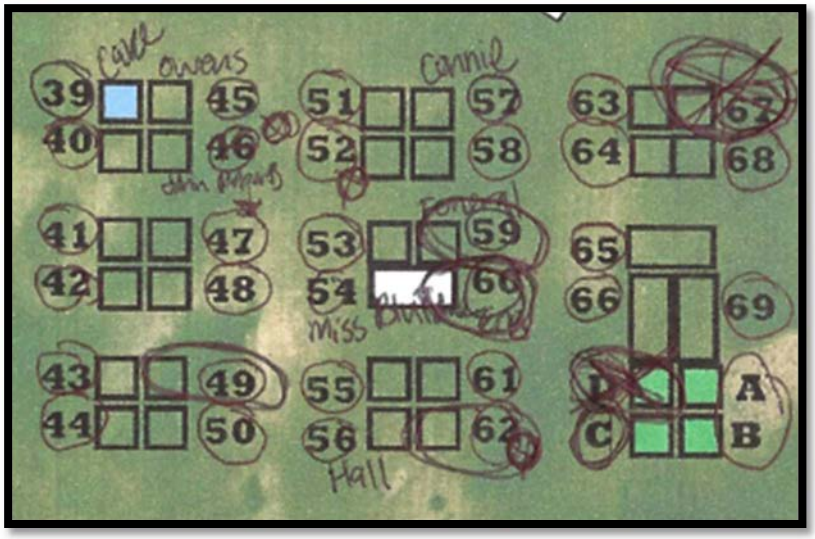
86. On June 2, 2021, "John Roberts for Mayor" signs started appearing in Bluffdale.

87. On June 14, 2021, Mr. Hall sent another anonymous email to Mr. Gaston, teased Mr. Gaston that he should run for Mayor.

88. On June 20, 2021, Mr. Hall sent another email to Mr. Gaston stating, "John Roberts, huh? That's the best you can do for a puppet for mayor?"

Confrontation at Old West Days

89. On August 14, 2021, the City held its Old West Days celebration, organized by Ms. Pavlakis and Ms. Robbins. The event included a parade and a celebration at a local park, where political candidates could sign up for booths and pitch their candidacy to voters.



90. John Roberts was placed at Booth No. 47, near the center of the park, and Natalie Hall was placed at Booth No. 56, near the outer edge of the park. Booth No. 62, which was adjacent to Ms. Hall's booth, was initially left unoccupied.

91. Around noon on August 14, Mr. Gaston told another City Council member, Traci Crockett (an incumbent City Council member running for reelection), that he had reserved a booth right next to Natalie Hall, and that he was going to put up some John Roberts signs in that space.

92. Both Traci and her husband Kyle implored Mr. Gaston not to do that, stating it would only cause a scene. Mr. Gaston laughed and said they could not change his mind.

93. In Booth No. 62, Mr. Gaston set up a large folding camp chair with a large, attached umbrella which covered the view of Ms. Hall's large sign facing East. Mr. Gaston then placed a handful of Roberts campaign signs in the space. Mr. Gaston then left the booth.

94. Irritated by Mr. Gaston's brazen attempt to block the view of Ms. Hall's booth, Mr. Hall picked up several of the Roberts campaign signs to take them back to John Roberts' booth.

95. Upon leaving, Mr. Hall ran into Mr. Gaston near Booth No. 62, who was returning with even more Roberts campaign signs. Mr. Hall tossed the signs down at Mr. Gaston's feet,

stating, "Get these out of here." Mr. Gaston responded, "You better back off, man." Mr. Hall responded, "Oh I had better back off? After the shit you've done to my wife?" Mr. Gaston replied, "I haven't done anything to your wife, I'm just doing my job." Mr. Hall, realizing the futility of reasoning with Mr. Gaston replied, "You're fucking pathetic," and turned back into Ms. Hall's booth.

96. Soon after this confrontation, Mr. Gaston seized the opportunity by contacting City Manager Mark Reid but Mr. Gaston failed to mention any physical aspect to the confrontation.

97. Mr. Reid explained that he was not on site and instructed Mr. Gaston to find the Public Works Director, Shane Paddock, to resolve the situation.

98. Mr. Paddock then accompanied Mr. Gaston back to Ms. Hall's booth, where they had a conversation with Mr. Hall.

99. The conversation was calm and cordial.

100. During the conversation, Mr. Gaston emphasized, "We can't have that kind of language in our City," but again he did not mention any sort of physical aspect to the confrontation.

101. Mr. Gaston explained that he had been assigned Booth No. 62. Mr. Hall explained

that if that was actually Mr. Gaston's booth, then he was sorry for trying to get Mr. Gaston to leave. Mr. Hall said that, after hours of that booth being empty, it looked like Mr. Gaston was just trying to antagonize the Halls by blocking the view and putting her opponent's signs right next to them.

102. Overall, the conversation was conciliatory, and it ended in a handshake, at which point Mr. Gaston agreed to move his items elsewhere.

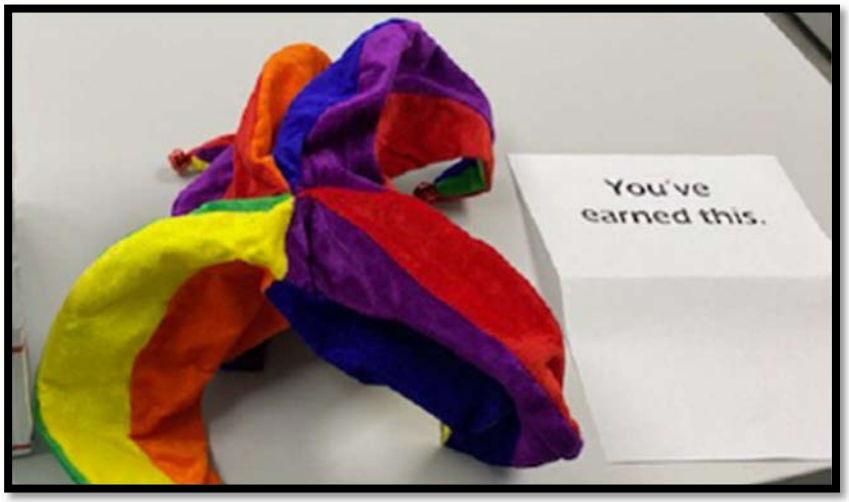
103. This entire interaction was secretly recorded at Mr. Gaston's request.

104. After the incident, Mr. Gaston returned to the Crockets' booth with a smug look on his face, laughing, and said, "Did you see that?"

Election Day

105. On November 2, 2021, John Roberts, Connie Robbins, and Tammy Rasmussen (all the candidates that Mr. Gaston was supporting) lost the election.

106. On November 3, 2021, Mr. Hall sent a jester hat to Mr. Gaston's house with a printed note ("Hall Note No. 2"), stating: "You've earned this."



Mr. Gaston's elaborate, knowingly false story to police

107. The same day, Mr. Gaston approached Bluffdale Police Sgt. Nick Stidham, asking

Sgt. Stidham to find out who sent the hat.

108. On November 4, 2021, Sgt. Stidham connected Mr. Hall to the gag gifts and communicated this finding to Mr. Gaston.

109. From this point in time, Mr. Gaston directed his humiliation and rage into fabricating a story of victimhood with the help of Sgt. Stidham. This time, however, it was not just a smear campaign. This time, Mr. Gaston planned to feed false evidence to the police in an elaborate scheme to take down Mr. Hall, and by doing so, ruin the reputation of the newly elected Mayor Hall.

110. On November 8, 2021, Mr. Gaston filed a lengthy report with Bluffdale Police, claiming, among other things: (1) that he had been physically assaulted at the park by Mr. Hall during Old West Days; (2) that he had been receiving not just gag gifts but death threats from Mr. Hall; (3) that he had been in fear for his life since June 14, 2021 (the time in which he now claimed to have determined that the Halls wanted to kill him); and (4) that these threats dissuaded him from running for Mayor.

111. Along with his statement, Mr. Gaston provided physical evidence, including two printed alleged threat letters which he claimed were sent to him.

112. Mr. Gaston claimed to have received the first threat letter ("Gaston Threat Letter No. 1") on March 9, 2021, along with the gag gift sent by Mr. Hall.

113. Alleged Threat Letter No. 1 stated:

> Hey Imbecile! Move out of Bluffdale, apologize or kill yourself! If you can't do that, then maybe you will just end up being killed. It's time to start watching your back. This is your final warning. We are moving to the next phase. Do what we ask or we will do what must be done.

Hey imbecile!!!!!!

Move out of Bluffdale, apologize or kill yourself! If you can't do that then maybe you will just end up being killed. Its time for you to start watching your back. This is your final warning. We are moving to the next phase. Do what we ask or we will do what must be done.

114. Mr. Gaston claimed to have received the second threat letter ("Alleged Threat Letter No. 2") at City Hall. He alleged that the letter was sent to City Hall on March 11, 2021, and that he opened the letter at the City Council meeting on March 24, 2021.

115. Alleged Threat Letter No. 2 stated:

> I am going to keep this short. We know you have paper-thin skin. To be clear, I will never judge a city official for their political views. However, it has become very clear lately that our messages are not getting across to you. We are ready to move to the next phase. 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.

I am going to keep this short. We know you have paper-thin skin.

To be clear, I will never judge a city official for their political views. However, it has become very clear lately, our messages are not getting across to you. We are ready to move to the next phase. 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.

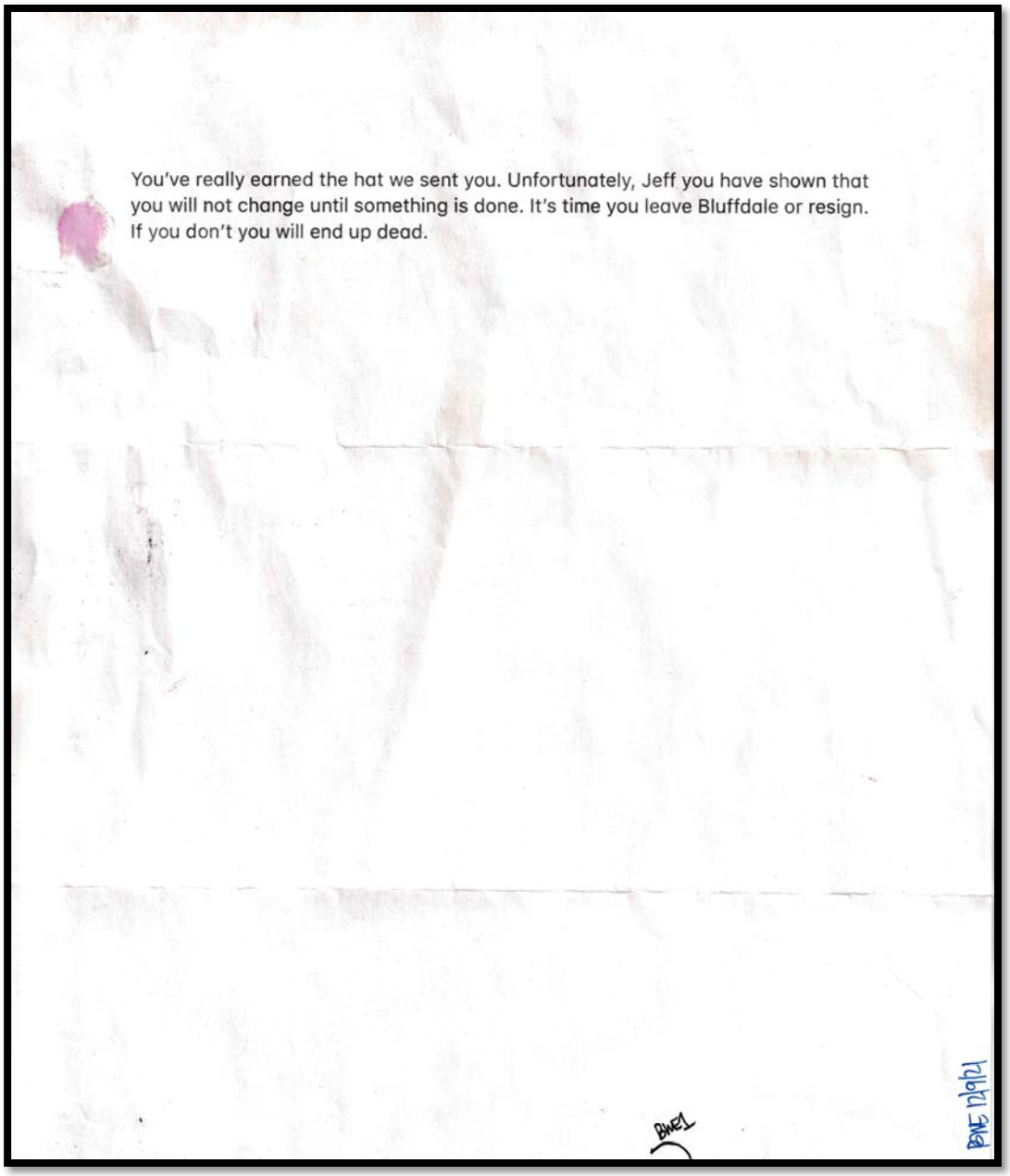
116. On November 9, 2021, Sgt. Stidham sent the case to the Utah Attorney General's Office ("AG's Office"), claiming he had a conflict of interest, at which point the AG took the case.

117. The AG investigator failed to seriously vet Mr. Gaston or his elaborate story.

118. On November 23, 2021, in an attempt to bolster the manufactured case against Mr. Hall, Mr. Gaston told police that he received a third threat letter ("Alleged Threat Letter No. 3"), this time reporting to the Utah Attorney General's investigator, and providing a video of himself walking to his mailbox, bringing mail inside his home, and opening the letter.

119. Alleged Threat Letter No. 3 stated:

> You've really earned the hat we sent you. Unfortunately, Jeff you have shown that 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.


You've really earned the hat we sent you. Unfortunately, Jeff you have shown that 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.

120. Ultimately, on June 30, 2022, the AG's Office fell victim to confirmation bias, filing criminal charges against Mr. Hall under the theory that, because Mr. Hall sent the gag gifts, he also sent the threat letters and committed the assault. Mr. Hall was charged with Assault,

Stalking, and Threatening a Public Official.

121. On the tails of the criminal charges, Ms. Robbins and Ms. Pavlakis coordinated protests inside City Council meetings, contacted the news media, and put signs up across from City Hall stating, "Natalie Hall supports criminal behavior," and "Mayor Hall: Resign."

122. Mr. Gaston's story about the alleged assault and alleged threat letters was false, and Mr. Hall was forced to go to lengths to prove the falsity of Mr. Gaston's claims, including sitting for a polygraph examination, hiring a forensic document expert, and examining the alleged threat letters in detail.

Polygraph Examination

123. Early in the case, Mr. Hall offered Mr. Gaston the opportunity to sit for a polygraph examination, and Mr. Hall agreed to do the same to establish the truth.

124. Mr. Gaston, through his attorney, declined this offer.

125. Determined to prove his innocence, Mr. Hall went ahead and sat for the polygraph. The polygraph examination was taken by a polygraph examiner who recently retired from 30 years

of service with the FBI.

126. The polygraph results indicated that Mr. Hall had no involvement with any death threats or threatening packages, and that he never assaulted Mr. Gaston at Old West Days.

Forensic Document Testing

127. Mr. Hall hired Gerald LaPorte, one of the highest regarded forensic document examiners in the country and asked him to compare the paper and ink of the Hall Notes that Mr. Hall admitted to sending against the three alleged threat letters. Mr. Hall also asked Mr. LaPorte to test the printers located at Mr. Hall's home and office.

128. Mr. LaPorte conducted chemical testing of the ink and toner from each Hall Note, each alleged threat letter, and printed samples taken from Mr. Hall's printers.

129. Mr. LaPorte found that Alleged Threat Letter No. 1 ("Hey imbecile!!!!") and Alleged Threat Letter No. 3 ("You've really earned the hat we sent you") were printed by an office machine system using color inkjet, likely from the same printer based on the similar printing defects, and similar microscopic and chemical characteristics of the ink.

130. Mr. LaPorte also found that Alleged Threat Letter No. 1 and Alleged Threat Letter No. 3 could not have come from the printers at Mr. Hall's home or workplace because those printers used a different type of ink, which was toner.

131. Although Mr. Gaston's story was that Alleged Threat Letter No. 1 and Hall Note No. 1 ("I hope this helps…") were purportedly sent in the same envelope, Mr. LaPorte found no evidence those two documents came from the same printing source.

132. Rather, Mr. LaPorte found that Hall Note No. 1 and Alleged Threat Letter No. 1 were printed on different paper, using different ink, and were produced by different printers.

133. These results undermine Mr. Gaston's false narrative that these two documents

were printed by Mr. Hall and included in the same package.

134. Mr. LaPorte also found that Hall Note No. 1 ("I hope this helps…") and Hall Note No. 2 ("You've earned this"), which Mr. Hall admits sending, were printed using black toner, that the ink on these two documents was "chemically indistinguishable," and that it was the same as the ink from one of Mr. Hall's workplace printers.

135. This, of course, supported Mr. Hall's story, particularly his claim that he sent Mr. Gaston only non-threatening notes.

136. Mr. LaPorte found that Alleged Threat Letter No. 2 ("I am going to keep this short…") was printed using black toner but with different chemical characteristics from the two documents that Mr. Hall admits to sending, which were Hall Note No. 1 and Hall Note No. 2.

Physical Characteristics

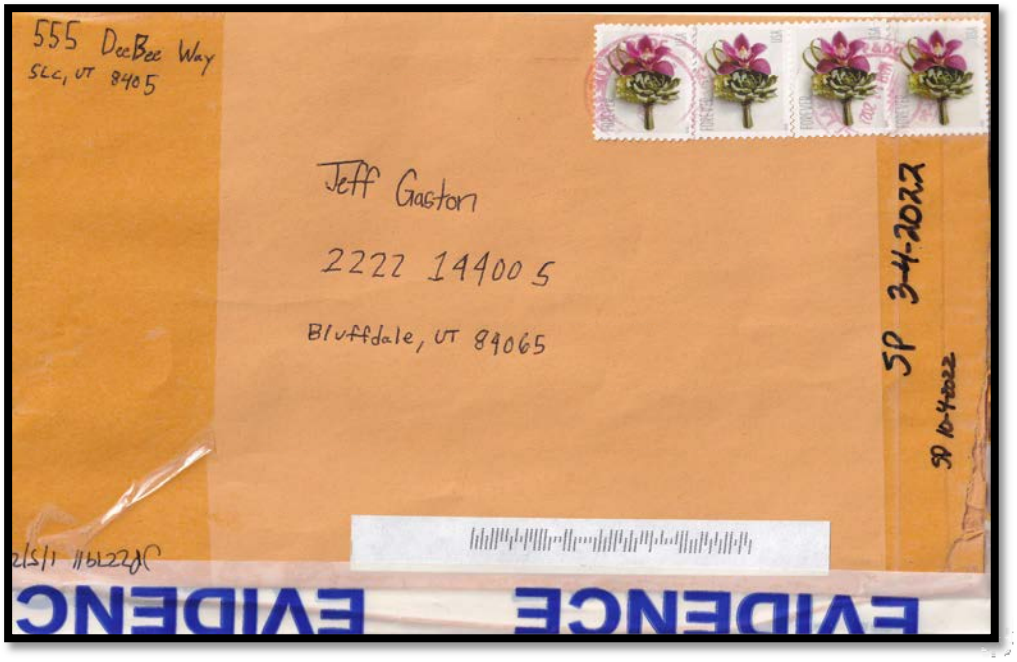
137. Even to the naked eye, the alleged threat letters that Mr. Gaston gave to the police failed to match up with Mr. Gaston's own account.

138. Alleged Threat Letter No. 1 was allegedly sent along with the anger management coloring book and Hall Note No. 1 that Mr. Hall admittedly sent.

139. Despite Mr. Gaston's claim that Alleged Threat Letter No. 1 arrived in the same package as Hall Note No. 1, the differences between the two documents were obvious: Alleged Threat Letter No. 1 was tri-folded while Hall Note No. 1 was not folded at all; Alleged Threat Letter No. 1's font size was significantly smaller than the font of Hall Note No. 1; and Alleged Threat Letter No. 1 and Hall Note No. 1 used different types of paper.

140. These differences make it highly implausible that the two documents were produced at the same time, by the same person, or with the same intent.

141. Alleged Threat Letter No. 2, according to Mr. Gaston, came in a manila envelope addressed to "Jeff Gaston" and sent to City Hall, which included four hand-placed stamps.



142. Alleged Threat Letter No. 3 was allegedly sent to Mr. Gaston in a white envelope with no return address and Mr. Gaston's address was typed on paper and taped to the envelope.

143. Comparing the envelopes, Mr. Gaston had clearly changed his approach as the investigation became more serious. Initially, Mr. Gaston attempted to forge Mr. Hall's handwriting on the address lines of Alleged Threat Letter Nos. 1 and 2. But with Alleged Threat Letter No. 3, he used a more sterile approach by printing the address.

144. Of course, it would have made no sense for someone like Mr. Hall, who had been unaware of any criminal investigation, to change his approach.

145. On the other hand, for someone like Mr. Gaston, who knew at that point that the AG's Office was involved in a full-blown investigation, it made perfect sense to change his approach to sending himself a letter. This was getting serious, and Mr. Gaston was not going to take any chances that might allow the AG's Office to find out that he was the one sending them.

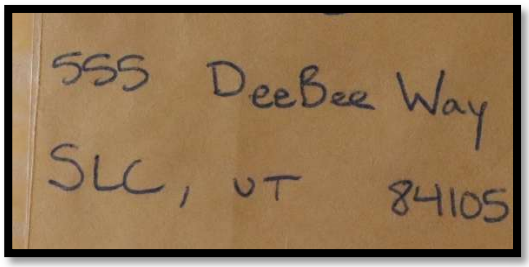
146. The envelope used to send Alleged Threat Letter No. 3, similar to the envelope sent to City Hall with Alleged Threat Letter No. 2, had hand-applied stamps, which was notably different from Mr. Hall's pattern of mailing gag-gifts at the counter of the Post Office.

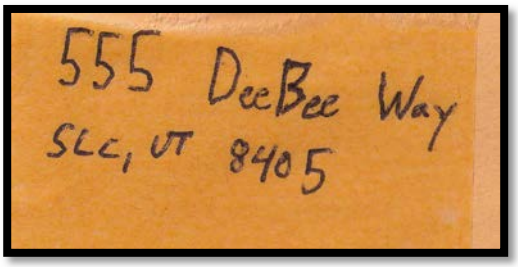
Handwriting

147. There are a number of different examples of handwriting across the packages admittedly sent by Mr. Hall and those envelopes carrying the Alleged Threat Letters.

148. The handwriting on the package with the coloring book and Hall Note No. 1 (figure

below on the left), which Mr. Hall admits to sending, was noticeably different from the handwriting on the envelope of Alleged Threat Letter No. 2 (figure on the right), allegedly mailed only two days later.





149. Mr. Hall's handwriting on the package containing Hall Note No. 1 was clear, fluid, and distinct.

150. But the handwriting on the envelope of Alleged Threat Letter No. 2, sent to City Hall, was visibly different, and it includes mistakes and shaky handwriting, as one might expect when someone is trying to hide their own penmanship.

151. On the return address of the envelope, the style of the number four is open—reflecting the author trying to mimic the return address on the package—but the two fours on the destination are closed.

Linguistics

152. The linguistic tone of the Alleged Threat Letters are patently different from the emails and Hall Note Nos. 1–2 sent by Mr. Hall, which criticized Mr. Gaston but did not reflect any sort of violence.

153. The language used in Alleged Threat Letter No. 1 ("If you can't do that then maybe you will just end up being killed") had no logical connection to the gag gift, while Hall Note No. 1, teased Mr. Gaston about his behavior, was clearly referencing the anger management coloring book ("I hope this helps with your issues, buddy").

154. The threat letters also attempted to mimic phrases used in Mr. Hall's emails.

155. Alleged Threat Letter No. 1 took the term "imbecile" from the July 20 email as well as the phrases "move out of Bluffdale" and "this is your final warning" from the June 14 email.

156. While Mr. Gaston's represents that he received Alleged Threat Letter No. 1 months before he received Mr. Hall's emails, the language of Alleged Threat Letter No. 1 shows that Mr. Gaston wrote Alleged Threat Letter No. 1 later, after he read the language Mr. Hall used in these emails.

157. For Alleged Threat Letter No. 2, Mr. Gaston took "paper-thin skin" and "not a statesman" from Mr. Hall's March 5 email, but the use of these phrases makes no sense: "It's time we put you down like the Dog you are, not a stateman."

158. Mr. Gaston claimed that Alleged Threat Letter No. 2 was mailed on March 11, just two days after he had allegedly received Alleged Threat Letter No. 1. But Alleged Threat Letter No. 2 states, "it has become very clear lately, our messages are not getting across to you." Under Mr. Gaston's story, the author's realization that the messages were not getting through to him just two days later seems illogical, and it would have given Mr. Gaston essentially no time for any sort of compliance to the alleged demand.

159. The threats' abrupt violence and nonsensical composition confirm that Mr. Gaston hastily stitched these phrases together after the fact to support his newly fabricated story of victimhood.

160. Alleged Threat Letter No. 3, allegedly sent on November 28, 2021, after Mr. Gaston knew the AG's Office was investigating, upped the rhetoric, including the phrase "do what we ask or you will end up dead," almost as if to make sure the AG's Office had enough to show that Mr. Gaston's life was truly being threatened. Alleged Threat Letter No. 3 also conveniently linked to

the jester hat which Mr. Gaston knew had been sent by Mr. Hall.

Staging

161. Mr. Gaston made sure his opening of Alleged Threat Letters Nos. 2 and 3 were recorded so that he could send the AG's Office supposed evidence of his false claims that he was not merely being teased but actually threatened.

162. Mr. Gaston anonymously mailed Alleged Threat Letter No. 2 to the City addressed to himself and it arrived at City Hall on March 12, 2021. Then a couple weeks later, on March 24, 2021, the letter was conveniently placed in front of Mr. Gaston's City Council seat prior to the Council meeting that day.

163. According to Mr. Gaston's account to police, he received the package with Hall Note No. 1 and the coloring book teasing him over his behavior just two weeks prior, and now there was a letter with the same faux return address sitting in front of him.

164. Instead of opening the letter upon sitting down prior to the commencement of the meeting and prior to the start of the video recording, Mr. Gaston waited for the meeting to start and waited for his neighbor to start speaking on the record before he opened it. Mr. Gaston waited nearly an hour and a half with that allegedly suspicious-looking letter with the same faux return address staring at him throughout the meeting.

165. Once Mayor Timothy, sitting next to Mr. Gaston, began to speak, Mr. Gaston picked up the envelope with his hands, cut it open, held it up high, and shook it waiting for the letter to slide out.

166. According to another Council member, this hands-on approach was noticeably different from Mr. Gaston's normal letter-opening routine. Normally, Mr. Gaston opened his letters without touching the envelope with his fingers, but instead with a couple of pens, as if the envelope contained something like Anthrax.

167. This time, however, Mr. Gaston appeared to know what was in the letter already.

168. Of course, Alleged Threat Letter No. 2 could have been opened discreetly behind the barrier that hides the council desks from view of the camera. It could have been opened prior to the start of the video recording. It could have also been opened after the meeting when Mr. Gaston did not have official business to attend to. But instead, Mr. Gaston made sure that he was being recorded, and that the envelope was seen, shaking the envelope high in the air.

169. Mr. Gaston then went on to read the letter, taking on a feigned look of concern and disappointment.

170. At the end of the meeting, Mr. Gaston used two pens to slide Alleged Threat Letter No. 2 into his briefcase, as if suddenly afraid of touching it with his bare hands.

171. Then, after so swiftly reporting the emails and gag gifts to police, Mr. Gaston

waited eight months to report Alleged Threat Letter No. 2 to police.

172. Mr. Gaston's opening of Alleged Threat Letter No. 3 was also documented.

173. This time, Mr. Gaston had his girlfriend film him walking out to his mailbox, as if he already knew there would be a threatening letter inside his mailbox. He then provided a surprised look on his face as he opened the mailbox, after which he walked back inside his home.

174. Once inside, the opening of Alleged Threat Letter No. 3 was a repeat of Mr. Gaston's performance during the March 24, 2021 City Council meeting, which included a feigned look of concern and disappointment. Mr. Gaston also shook his head. His girlfriend filming Mr. Gaston even added in the comment, "looks suspicious," for effect.

Inconsistencies in Gaston's Narrative

175. There are also numerous inconsistencies in Mr. Gaston's story.

176. Mr. Gaston claimed that he had received Alleged Threat Letters Nos. 1 and 2 in March 2021: one slipped into the gag gift package containing the coloring book he received and the other mailed to City Hall. He also claimed he was in fear for his life, believing that someone was going to kill him during this time.

177. Mr. Gaston's narrative, however, does not square with the fact that, in March 2021, Mr. Gaston reported the emails criticizing his behavior at the City Council meeting to police *immediately* upon receipt and demanded a criminal investigation into the gag gifts sent to City Hall on the day they arrived, but for some reason he failed to report the most allegedly violent pieces of evidence (*i.e.*, the alleged threat letters), holding onto the alleged threat letters for eight months only to produce them once Mr. Gaston discovered that Mr. Hall sent the gag gifts.

178. Despite Mr. Gaston's claims to be in fear for his life, supposedly believing since July 2021 that the Halls wanted to kill him, Mr. Gaston showed no signs of fear, sitting near Ms. Hall during City meetings and laughing to City Council members about him antagonizing the Halls at Old West Days.

179. But once Mr. Gaston determined Mr. Hall sent the gag gifts and once Mr. Gaston knew the AG's Office was watching, Mr. Gaston suddenly began bringing Sgt. Stidham with him to City Council meetings, citing supposed safety concerns.

180. Chronological, contextual, and forensic evidence all show that Mr. Gaston fabricated the alleged threat letters.

Mr. Gaston's claim of running for Mayor

181. Mr. Gaston's story to the AG's Office included the claim that he had previously contemplated running for Mayor and that he "was up in the polls," but this is false.

182. Mr. Gaston never announced that he was running for Mayor, never held a launch party, and never declared as a candidate with the City.

183. Despite Mr. Gaston's claim that he was "far ahead in the polls," there were, in fact, no Bluffdale polls in this election cycle. In Bluffdale, the smallest city in Salt Lake County, polls are rarely, if ever, conducted. During the timeframe in which Mr. Gaston later claimed he was far

ahead in the polls, it was still months before any candidate could officially declare themselves as officially running for office.

184. Mr. Gaston's timeline was that he dropped out of the race on or around June 14, 2021, because he feared the Halls were planning to kill him.

185. But, in the late Spring of 2021, Mr. Gaston was already assisting the John Roberts mayoral campaign, helping with fundraising and preparing campaign signs.

186. Mr. Gaston lied about running for Mayor in order to bolster the AG's charge against Mr. Hall for threatening a public official to influence official action.

Alleged Assault

187. In his November 8, 2021 police report, Mr. Gaston claimed that, three months prior, during the confrontation at Old West Days, Mr. Hall physically assaulted Mr. Gaston by attacking him with campaign signs that left Mr. Gaston's arm cut and bloodied.

188. These claims are false.

189. Mr. Gaston specifically claimed this attack took place in the middle of the City event, surrounded by hundreds of people, and in his own booth next to Ms. Hall's.

190. While Mr. Gaston's initial statement to police claimed Mr. Hall "took down my signs and threw them at my hands" and that "[t]he signs that he threw ended up scratching my arm," one year later in his 1102 Statement,[1] Mr. Gaston claimed Mr. Hall "threw the signs at me striking me in the face, arms and leaving scratches and marks on my arms."

191. In September 2022, after being pressed by investigators about the validity of his claim, Mr. Gaston brought forward evidence to corroborate his story, including a photograph

[1] 1102 Statements are written witness statements submitted under oath pursuant to Utah Rule of Evidence 1102(b)(8), often used in lieu of live witness testimony at preliminary hearings in criminal cases.

depicting a superficial scratch across his right forearm, approximately ¼" in length, a secretly recorded video of Mr. Gaston returning to discuss the incident with Mr. Hall, and several alleged witnesses, all who claim to have seen the alleged assault.

192. The photograph Mr. Gaston provided to police was later examined by a former medical examiner hired by Mr. Hall, who reported that the superficial scratch showed signs of healing, and who also indicated that the scratch was likely not caused by a campaign yard sign.

193. The video of Mr. Gaston returning to Ms. Hall's booth with Shane Paddock to discuss the incident with Mr. Hall was taken roughly ten minutes after the incident.

194. However, the video does not support Mr. Gaston's claims of violence and harm by Mr. Hall. Rather, it shows Mr. Gaston having a calm eight-minute conversation with Mr. Hall, focused solely on Mr. Hall's colorful language.

195. At no point during the recorded conversation about Mr. Gaston's expressed issues with what had just occurred did Mr. Gaston mention any violence, scratches, or assault. Had Mr. Gaston actually been assaulted, surely that topic would have been addressed.

196. The high-definition video provides a close-up shot of Mr. Gaston's face and arms, where he had allegedly been cut and bleeding, but the video shows no cuts or signs of blood.

Witnesses of the Alleged Assault

197. There were two sets of witnesses that were interviewed by the AG's Office: one group that were particularly close to the booth where the confrontation took place, and another group that were far away from the confrontation but that supported Mr. Gaston's story.

198. Three eye-witnesses standing 10–15 feet from the interaction between Mr. Hall and Mr. Gaston stated that no physical assault took place.

199. Councilmember Traci Crockett was running for re-election and had a booth across the walkway from Mr. Gaston's booth.

200. According to Ms. Crockett, prior to setting up Roberts for Mayor signs near Ms. Hall's booth, Mr. Gaston chatted with her and her husband, expressed his amusement that he had been assigned to the booth adjacent to Ms. Hall, and told them he was going to put up a bunch of Roberts signs in that space before the Crocketts implored him not to do so. Mr. Gaston laughed and told the Crocketts that he was going to do it anyway and "see what happened."

201. The Crocketts told investigators that Mr. Hall scooped up some of the signs and started off toward Mr. Roberts' booth to return them when he encountered Mr. Gaston coming back with more, just outside Mr. Gaston's booth.

202. They stated that Mr. Hall tossed the signs on the ground and muttered something they could not hear due to ambient noise, that they saw Mr. Hall and Mr. Gaston then exchange a few words, and then Mr. Hall turned back into his wife's booth and Mr. Gaston left.

203. When pressed by investigators, the Crocketts explained that they were very keyed in the situation because Mr. Gaston had just told them what he was going to do, and that it was clear he was trying to start something or get a reaction from the Halls. They were watching intently to see what would happen.

204. The Crocketts confirmed that there was no sign throwing, hacking-down, or attack of any kind by Mr. Hall, and that Mr. Gaston was not injured in any way.

205. After Mr. Gaston returned with Shane Paddock to talk to Mr. Hall, and Mr. Gaston took his items elsewhere, he stopped by the Crocketts booth again, laughing, and said, "Did you see that?"

206. Investigators also interviewed Cindy Strong, who was in the Miss Bluffdale booth about 15 feet from the encounter.

207. Ms. Strong also saw the confrontation and recounted the same observations as the Crocketts: that Mr. Hall and Mr. Gaston had some tense words lasting about ten seconds, and then Mr. Hall turned away. She stated that there was no attack, no injuries, and no assault.

208. These eye-witness accounts, which match each other and match the photo and video evidence submitted by Mr. Gaston himself, corroborate Mr. Hall's version of the interaction and refute Mr. Gaston's fabricated account.

209. The witnesses who came forward to support Mr. Gaston's account, claiming to have witnessed the assault, all happen to be politically opposed to Natalie Hall as Mayor, were close friends of Mr. Gaston, and two of them (Ms. Pavlakis and Ms. Robbins) intentionally placed Mr. Gaston's booth next to Ms. Hall to antagonize the Halls.

210. One of those witnesses, John Roberts, lied in his 1102 Statement to support Mr. Gaston's story.

211. Mr. Roberts had a motive to support Mr. Gaston's fabricated story. Mr. Roberts ran against Ms. Hall for Bluffdale Mayor. And, at the time of his statement, Mr. Roberts was under investigation for misuse of public funds by the Salt Lake County Attorney's office.

212. Mr. Roberts stated that from Booth No. 47, he saw Mr. Hall "throwing signs at Jeff

Gaston," "hit[ting] him in the upper portions of his body, his arms and face," and that he later saw Mr. Gaston had "scratches all over the face, and some bleeding on the arm." He also claimed that Mr. Hall "pushed" Mr. Gaston.

213. But Mr. Roberts could not have seen or heard the confrontation between Mr. Hall and Mr. Gaston from his booth that was in another area of the park, and Mr. Roberts knew his claims were false when he made them.

214. From 70 feet away and from his own booth, Mr. Roberts could not have seen much of anything. The line of sight would have been blocked by canopies, signs, banners of the other booths, and hundreds of people. As reflected by the video, it was also impossible to hear much of anything because of the music, crowd, and food truck generators.

215. Kelly Bertoch also provided a statement to police, claiming to have seen the alleged assault from the first aid booth, roughly 150 feet away from where the incident occurred (near Booth No. 62).

216. Mr. Bertoch has a long history of working with John Roberts, as well as volunteering for things for Ms. Pavlakis.

217. Mr. Bertoch told investigators in his 1102 Statement that he saw the confrontation from a booth near Roberts' booth, claimed that it took place near Roberts' booth (contradicting Mr. Gaston's own account), and claimed Mr. Hall "picked up some square election signs and hit Jeff Gaston with them." He also claimed that this left Mr. Gaston with "some pretty good gashes."

218. But the high-definition video recorded shortly thereafter show no scratches at all.

219. Wayne Mortimer also stated in his 1102 Statement that he saw the confrontation from John Roberts' booth.

220. Mr. Mortimer is friends with Mr. Gaston, Mr. Roberts, Ms. Pavlakis, and Ms.

Robbins, and recited this false narrative to investigators to bolster Mr. Gaston's claim.

221. Mr. Mortimer claimed he saw Mr. Hall "pick up the signs next to Jeff Gaston's booth and throw and hacked the sign on Jeff," that he "hacked the signs on Jeff pretty bad." He also claimed he saw "more than one scratch on one arm and a scratch on the other one as well."

222. Mr. Mortimer's claims describing the injuries were refuted by video and photographic evidence. Mr. Mortimer claimed to have seen the whole thing from Mr. Roberts' booth, after hearing a commotion, but he could not have seen the interaction through all of the canopies, signs, and people, and he certainly would not have heard a commotion.

223. Ms. Pavlakis also gave a false statement to investigators.

224. Ms. Pavlakis was responsible for booth assignments as the Chair of the Old West Days event, and intentionally assigned Mr. Gaston a booth next to Ms. Hall intending to upset Ms. Hall as she tried to operate her own booth

225. Ms. Pavlakis, a year after the incident, told investigators that she encountered Mr. Gaston near the Old West Building sometime after the alleged assault. There, according to Ms. Pavlakis, Mr. Gaston approached her, asking where Mark Reid was and stating that Mr. Hall had just attacked him. She claimed Mr. Gaston showed her "the cuts on his arms, some were bleeding and some not, which looked like little lines, like paper cuts, lots of fine lines."

226. Additionally, in 2023, Ms. Robbins told investigators that while she did not see the alleged assault, but that she saw Mr. Gaston's injuries up close, claiming that "immediately" after the incident Mr. Gaston showed her his arm and told her what happened. She specifically said she saw "some gouges on his arm where he was bleeding."

227. The stories and claims made by these witnesses show a coordinated effort to further the false claims of Mr. Gaston and get rid of Natalie Hall as the Bluffdale Mayor

Aftermath of Mr. Gaston's story

228. Mr. Gaston's falsities, in combination with those of his friends, led to fraudulent criminal charges against Mr. Hall, and serious reputational damage to Mayor Hall.

229. Following the charges against Mr. Hall, Ms. Pavlakis, Ms. Robbins, and Mr. Gaston attempted to secure Ms. Hall's resignation from her role as Mayor.

230. They coordinated protests at City Council meetings for months after the news broke, with Ms. Robbins and her husband repeatedly placing signs across from City Hall that read, "Resign Natalie Hall" and "Mayor Hall supports criminal behavior."

231. Ms. Robbins contacted news reporters and informed them of protests that would occur at the City Council meetings, to be sure they would be covered in the news.

232. Over the last several years, Ms. Pavlakis and Ms. Robbins have worked feverishly to incite rage in other citizens, encouraging them to show up and demand Mayor Hall's resignation despite, upon information and belief, Ms. Pavlakis and Ms. Robbins knowing that Mr. Gaston himself drafted the alleged threat letters and that their testimony regarding the Old West Days confrontation was false.

233. Even as recently as February 26, 2025, Ms. Robbins coordinated protests calling for Mayor Hall's resignation.

234. Mayor Hall endured this black cloud of fraudulent claims hanging over her head for her entire tenure as Mayor.

235. In carrying out this unethical and unlawful scheme, Mr. Gaston, Ms. Pavlakis, and Ms. Robbins caused the Hall family severe mental and emotional distress and has cost the Hall family hundreds of thousands of dollars in legal fees.

FIRST CLAIM FOR RELIEF
(Intentional Infliction of Emotional Distress – Against All Defendants)

236. The allegations contained in the paragraphs above and below are incorporated herein by reference.

237. As alleged above, including in Paragraphs 32–65, 107–122, 228–235, Mr. Gaston, Ms. Pavlakis, and Ms. Robbins made knowing misrepresentations to police, news media, and the public about Mr. Hall and Ms. Hall with the purpose of inflicting emotional distress on the Hall family, or they knew or should have known that it was highly probably that harm would result from their intentional acts.

238. Along with the help of Mr. Gaston, Ms. Pavlakis and Ms. Robbins fabricated three smear letters sent to the City as alleged above, which included outrageous claims that an affair between Ms. Hall and the Bluffdale City Manager resulted in Ms. Hall receiving preferential treatment including increased wages from the City.

239. Counterclaim Defendants knew these statements were false or knew or should have known that it was highly probable that publishing these statements about Ms. Hall would harm her reputation and her emotional wellbeing.

240. As alleged above, including Paragraphs 107–196, Mr. Gaston intentionally fabricated an elaborate lie about Mr. Hall, piecing together falsified evidence, creating the alleged threating letters, and lying repeatedly to police over several years in order to frame Mr. Hall for crimes that he did not commit.

241. Ms. Pavlakis gave statements against Mr. Hall intending to inflict emotional distress or knowing, or she should have known, that it was highly probable that her false statements would result in harm to Mr. Hall.

242. The actions of Mr. Gaston, Ms. Pavlakis, and Ms. Robbins, as alleged above, are

outrageous and intolerable, and they clearly offend accepted standards of morality.

243. Mr. Gaston, Ms. Pavlakis, and Ms. Robbins intended to cause the Halls emotional distress or acted with reckless disregard of the probability of causing emotional distress to the Halls.

244. The Halls have suffered severe and extreme emotional distress, including but not limited to serious anxiety and a significant loss of sleep, caused by the conduct alleged above by Mr. Gaston, Ms. Pavlakis, and Ms. Robbins.

245. These false statements have caused severe reputational damage to the Halls and have caused the Halls severe mental and emotional distress.

246. Counterclaim Defendants' acts damaged the Halls by causing them to incur hundreds of thousands of dollars in legal fees, which they were forced to pay in order to defend Mr. Hall against their false narratives.

247. The Halls are entitled to punitive damages because Counterclaim Defendants' conduct was willful and malicious, intentionally fraudulent, or manifested a reckless indifference toward, and a disregard of, the rights of others, including the Halls.

SECOND CLAIM FOR RELIEF
(Negligent Infliction of Emotional Distress – Against All Defendants)

248. The allegations contained in the paragraphs above and below are incorporated herein by reference.

249. As alleged above, including in Paragraphs 32–65, 107–122, 228–235, Mr. Gaston, Ms. Pavlakis, and Ms. Robbins each engaged in conduct that each should have realized involved an unreasonable risk of causing emotional distress to the Halls, including making false statements to police, news media, and the public about the Halls.

250. In doing so, they should have realized their conduct involved an unreasonable risk

that it would inflict emotional distress on the Halls.

251. They also should have known that, if their conduct did in fact inflict emotional distress on the Hall family, the distress might result in illness or bodily harm.

252. Counterclaim Defendants' conduct caused the Halls to sustain severe emotional distress, characterized by illness or bodily harm in the form of anxiety and loss of sleep.

253. The Halls have been damaged as a result of Counterclaim Defendants' conduct in an amount to be determined at trial.

254. The Halls are entitled to punitive damages because Counterclaim Defendants' conduct was willful and malicious, intentionally fraudulent, or manifested a reckless indifference toward, and a disregard of, the rights of others, including the Halls.

THIRD CLAIM FOR RELIEF
(Defamation – Against All Defendants)

255. The allegations contained in the paragraphs above and below are incorporated herein by reference.

256. As alleged above, including in Paragraphs 107–186, Mr. Gaston published false statements about Mr. Hall when he represented to the AG's Office and others that Mr. Hall sent him the alleged threat letters, and that he was running for Mayor of Bluffdale, when in fact Mr. Gaston had drafted the letters himself and when he was never running for this position.

257. As alleged above, including in Paragraphs 187–227, Mr. Gaston also published a false statement about Mr. Hall when he falsely told the AG's Office that Mr. Hall assaulted him at Old West Days.

258. Mr. Gaston's published statements about Mr. Hall were not privileged because they were not related to legal advice, medical treatment, nor any other recognized protected category.

259. As alleged above, including in Paragraphs 28–34, Ms. Robbins knowingly

published false statements about Ms. Hall when Ms. Robbins delivered a letter to a City Council member containing a knowingly false allegation that Ms. Hall was overpaid due to favoritism.

260. Ms. Robbins' statements were not privileged because they were not related to legal advice, medical treatment, nor any other recognized protected category.

261. As alleged above, including in Paragraphs 35–50, Ms. Pavlakis knowingly published false statements when she delivered a letter to a City Council member containing a false allegation that Ms. Hall was having an inappropriate relationship with the Bluffdale City Manager.

262. Ms. Pavlakis' statements were not privileged because they were not related to legal advice, medical treatment, nor any other recognized protected category.

263. Mr. Gaston, Ms. Pavlakis, and Ms. Robbins coordinated their efforts in publishing these statements.

264. Mr. Gaston, Ms. Pavlakis, and Ms. Robbins knew these statements were false, or made them with a reckless disregard for the truth without any verification of their veracity.

265. Mr. Gaston, Ms. Pavlakis, and Ms. Robbins acted with actual malice against the Halls or negligently relating to the published false statements.

266. Mr. Gaston, Ms. Pavlakis, and Ms. Robbins knew or should have known that these statements were likely to cause serious reputational harm and cause serious consequences.

267. Despite these facts, they made these statements anyway.

268. These false statements resulted in damage to the Halls, which damage includes reputational damage to Ms. Hall and Mr. Hall, and hundreds of thousands of dollars in legal fees to defend against criminal charges brought against Mr. Hall.

269. The Halls have been damaged as a result of Counterclaim Defendants' conduct in an amount to be determined at trial.

270. The Halls are entitled to punitive damages because Counterclaim Defendants' conduct was willful and malicious, intentionally fraudulent, or manifested a reckless indifference toward, and a disregard of, the rights of others, including the Halls.

FOURTH CLAIM FOR RELIEF
(Abuse of Process – Against Mr. Gaston)

271. The allegations contained in the paragraphs above and below are incorporated herein by reference

272. As alleged above, including in Paragraphs 99–114, Mr. Gaston, with malice, encouraged and caused the AG's Office to pursue criminal charges against Mr. Hall and filed this civil action against Mr. Hall knowing that Mr. Hall did not send the alleged threat letters to Mr. Gaston and knowing that Mr. Hall did not assault Mr. Gaston.

273. Mr. Gaston intentionally did so with the ulterior purpose of harassing and defaming the Halls.

274. Mr. Gaston also intentionally and with malice filed a civil lawsuit with the ulterior motive of further fabricating a false story against Mr. Hall to make it more difficult to defend himself in the criminal case.

275. Accordingly, Mr. Gaston has used these proceedings for an improper purpose and not to accomplish a purpose within the proper purpose for which these proceedings are designed.

276. The false statements alleged in this case resulted in serious damage, including reputational damage to Ms. Hall and Mr. Hall, and thousands of dollars in legal fees.

277. The Halls have been damaged as a result of Counterclaim Defendants' conduct in an amount to be determined at trial.

278. The Halls are entitled to punitive damages because Counterclaim Defendants' conduct was willful and malicious, intentionally fraudulent, or manifested a reckless indifference

toward, and a disregard of, the rights of others, including the Halls.

FIFTH CLAIM FOR RELIEF
(Conspiracy – Against All Defendants)

279. The allegations contained in the paragraphs above and below are incorporated herein by reference.

280. Mr. Gaston, Ms. Robbins, and Ms. Pavlakis conspired to fabricate damaging falsities about the Halls in order to harm their reputation and send Mr. Hall to jail for crimes that he did not commit.

281. The frequency with which they communicated, especially around key events relevant to this case, shows there was a meeting of the minds on the object or course of action to ruin Ms. Hall's reputation and subject Mr. Hall to prosecution.

282. Ms. Pavlakis and Ms. Robbins committed unlawful, overt acts in furtherance of the conspiracy by creating and presenting false allegations about Ms. Hall in their smear campaign, as alleged above, including Paragraphs 28–57.

283. Mr. Gaston committed unlawful, overt acts in furtherance of the conspiracy, including but not limited to filing a false police report, introducing falsified evidence, and making false statements to the AG's Office over several years, as alleged above, including in Paragraphs 99–227.

284. The Halls were proximately damaged as a result of Counterclaim Defendants' conduct, which damage includes but is not limited to reputational damage, and hundreds of thousands of dollars in legal fees to defend against criminal charges brought against Mr. Hall.

285. The Halls are entitled to punitive damages because Counterclaim Defendants' conduct was willful and malicious, intentionally fraudulent, or manifested a reckless indifference toward, and a disregard of, the rights of others, including the Halls.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38(b) of the Utah Rules of Civil Procedure, the Hall Defendants hereby demand a jury trial in this action on all issues so triable.

PRAYER FOR RELIEF

WHEREFORE, the Hall Defendants request the following relief:

A. Against each Counterclaim Defendant, jointly and severally, for their intentional infliction of emotional distress upon the Halls in an amount to be determined at trial but not less than $300,000, as alleged in the First Claim for Relief;

B. Against each Counterclaim Defendant, jointly and severally, for their negligent infliction of emotional distress upon the Halls in an amount to be determined at trial but not less than $300,000, as alleged in the Second Claim for Relief;

C. Against each Counterclaim Defendant, jointly and severally, for their defamatory statements published against the Halls in an amount to be determined at trial but not less than $300,000, as alleged in the Third Claim for Relief;

D. Against Mr. Gaston for his abuse of process harming the Halls in an amount to be determined at trial but not less than $300,000, as alleged in the Fourth Claim for Relief;

E. Against each Counterclaim Defendant, jointly and severally, for their conspiracy against the Halls in an amount to be determined at trial but not less than $300,000, as alleged in the Fifth Claim for Relief;

F. For an award of the Halls' reasonable attorney's fees and costs to the maximum amount allowed by law; and

G. Such other and further relief that the Court deems just and equitable.

DATED this 20th day of May, 2025.

DENTONS DURHAM JONES PINEGAR

/s/ Lyndon Bradshaw
Trinity Jordan
Lyndon R. Bradshaw
Jacob R. Lee

Attorneys for Counterclaimants and Third-Party Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 20th day of May, 2025, I caused a true and correct copy of the foregoing to be filed using the Court's electronic filing system, which sent notice to all counsel of record.

/s/ Shelby K. Irvin
Legal Assistant