

4. Shortly after February of 2015 the council member called me, one or more of the above named parties engaged in a patter of harassment against me individually and/or in my position as an elected official.
5. Members of the above named Council, in a closed do session verbally assaulted me for questioning the hiring of Justin Stoker. At this meeting the City Attorney walked out saying he did not want anything to do with this action and "disqualified himself".
6. Subsequently, I learned that the Interim City Manager and one or more of the above-named council members were violating open the Utah Governmental Open Meetings Act.
7. A criminal and/or civil investigation was wrongfully commenced against me by one or more of the above named parties through the West Jordan City Chief of Police and/or his Department. As a result, I was forced to hire legal counsel.
8. All or some of the above named parties continue to intentionally and/or harass me and cause me additional damage through disparaging my business.
9. On April 17<sup>th</sup>, 2015, during an emergency closed door session, I received a threatening letter from the Interim City Manager. Continual retaliation persisted as I was refused reimbursement for the costs of my attorney fees.
10. Party Chad Nichols intentionally and/or with malice stated that if I would "submit to a reprimand the city would pay my bill".
11. My ability to make a living suffered as a direct result of the actions of one or more of the above-named parties as it is related to publishing a community magazine.
12. One or more of the above named parties, in a further attempt to wrongfully harm me, began to make GRAMMA requests of my business partner, all without legal cause. As a result, I was forced to sell my business at a loss, cash in my IRA and my wife's IRA. In additional, my heath has suffered from the actions of the above named parties.
13. Damages continue to accrue.

## NOTICE OF CLAIM

In re: Claimant, Jeff Haaga

Pursuant to Utah Code Annotated §§ 63G-7-401 and 63G-7-203(c), along with violations of civil protections pursuant to and under, 42 U.S.C. § 1983, claimant hereby gives written notice of his claim against the above named persons individually and in their official capacities, for the following causes of action:

- A. Abuse of Process;
- B. Violation of Civil Rights;
- C. Conspiracy to Interfere with Civil Rights;
- D. Abuse of the Judicial System;
- E. Negligence;
- F. Willful Misconduct;
- G. Intentional Infliction of Emotional Distress;
- H. Violation of Due Process;
- I. Violation of Equal Protection;
- J. Violation of First Amendment;
- K. Breach of Implied Covenant of Good Faith and Fair Dealing; and,
- L. Negligent Infliction of Emotional Distress.

## STATEMENT OF FACTS

1. From beginning of October 2014, individually and through a conspiracy of two or more of the above-named parties, I was wrongfully investigated as an elected official and individual. This is substantiated by the emails from Interim City Manager and City Attorney.
2. Throughout 2015, I was the victim of intentional and wrongful comments disparaging made by Judith Hansen during City Council meeting.
3. After the first of the year 2015 one of the sitting council members was applying for a major position with the City of West Jordan. Through intentional and/or negligent acts of one or more of the parties named above, I was never timely told or advised of the hiring of this person.

# MEMORANDUM

**To:** Paul Dodd, Litigator  
**From:** Melanie S. Briggs, City Clerk  
**Date:** November 4, 2015  
**Subject:** Notice of Claim: Jeff Haaga

*Melanie*

Attached is a copy of a Notice of Claim received from the above-mentioned individual.

cc: Mark Palesh, City Manager  
Darien Alcorn, Acting City Attorney  
Jared Smith, Risk Manager

## CERTIFICATE OF SERVICE

I, Jeff Haaga, hereby certify that on this 4 day of November, 2015, I placed a true and accurate copy of the foregoing document to be mailed, certified, return receipt requested to the following parties at the addresses indicated:

West Jordan City  
8000 S. Redwood Road  
West Jordan, Utah 84088

Bryce Haderlie, individually  
and as former City Manager  
8000 S. Redwood Road  
West Jordan, Utah 84088

Justin Stoker, individually  
and as Deputy Public Works Director  
8000 S. Redwood Road  
West Jordan, Utah 84088

Jeff Robinson, individually  
and as former City Attorney  
8000 S. Redwood Road  
West Jordan, Utah 84088

Doug Diamond, individually  
and as City Chief of Police  
8000 S. Redwood Road  
West Jordan, Utah 84088

David Church individually  
and as Contracted City Attorney  
8000 S. Redwood Road  
West Jordan, Utah 84088

Eric Johnson, individually  
and as Contracted City Attorney  
8000 S. Redwood Road  
West Jordan, Utah 84088

Ben Southworth, individually  
and as City Council Member  
8000 S. Redwood Road  
West Jordan, Utah 84088

Chad Nichol, individually  
and as City Council Member  
8000 S. Redwood Road  
West Jordan, Utah 84088

Judith Hansen, individually  
and as City Council Member  
8000 S. Redwood Road  
West Jordan, Utah 84088

Chris McConnehey, individually  
and as City Council Member  
8000 S. Redwood Road  
West Jordan, Utah 84088

Sophie Rice, individually  
and as City Council Member  
8000 S. Redwood Road  
West Jordan, Utah 84088

## NATURE OF CLAIMS

The nature of the claims being asserted as: Abuse of Process; Violation of Civil Rights; Conspiracy to Interfere with Civil Rights; Abuse of the Judicial System; Negligence; Willful Misconduct; Intentional Infliction of Emotional Distress; Violation of Due Process; Violation of Equal Protection; Violation of First Amendment; Breach of Implied Covenant of Good Faith and Fair Dealing; and, Negligent Infliction of Emotional Distress, are to be more fully determined upon discovery.

The parties, individually and/or in concert with one another, acted maliciously against me in an effort to dissuade me from my actions in fulfilling my duties as a West Jordan City Council Member.

The parties knew, or should have known that their actions were improper, and would lead to the direct and proximate cause of the injuries that I have suffered.

## DAMAGES

Precise totals of the damages that I have incurred are not known but are believed to exceed \$750,000 and include:

1. Inability to perform my elected official duties because of fear of retaliation causing great emotional and physical issue. Hospitalized September 2014.
2. Loss of income during ownership of Utah Community Magazines LLC and Future Loss income.
3. Loss of physical health.

DATED this 4 day of November, 2015.

Sincerely,



Jeff Haaga

RECEIVED BY  
CITY CLERKS OFFICE

NOV. 04 2015

Time 11:34 By M. E. [Signature]  
am

Jeff Haaga

Telephone: (801) 649-2479

8778 SOUTH 1850 WEST

jeffhaaga@yahoo.com

WEST JORDAN, UTAH 84088

November 4, 2015

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