

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH

FILED US District Court-UT  
MAR 31 '25 PM 12:40

**MATTHEW REARDON,**  
Plaintiff,

v.

Case No. 1:25-CV-00041-JCB

**CITY OF LAYTON, UTAH;**  
**LAYTON POLICE DEPARTMENT;**  
**CITY OF OXFORD, MISSISSIPPI;**  
**OXFORD POLICE DEPARTMENT;**  
**CAPTAIN HILDON SESSUMS**  
(in his individual and official capacities);  
**CHIEF JEFF MCCUTCHEN**  
(in his individual and official capacities);  
**LIEUTENANT RILEY RICHINS**  
(in his individual and official capacity);  
**MARK ARRINGTON**  
(in his individual and official capacity);  
**JOHN DOES (1-139);** Defendants.

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**COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF**  
**JURY TRIAL DEMANDED**

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**I. INTRODUCTION**

1. This is a civil rights action under 42 U.S.C. §§ 1983 and 1985 arising out of coordinated surveillance, defamation, retaliation, obstruction, and unlawful denial of public records access by officials of Layton City, Utah and Oxford, Mississippi.
2. Plaintiff Matthew Reardon, a journalist and public transparency advocate, was targeted, surveilled, and defamed in retaliation for lawful First Amendment activity.

## **II. JURISDICTION AND VENUE**

3. This Court has jurisdiction under 28 U.S.C. § 1331 (federal question) and 28 U.S.C. § 1343 (Civil rights).
4. Supplemental jurisdiction over state claims exists under 28 U.S.C. § 1367.
5. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events or omissions giving rise to the claim occurred in Utah.

## **III. PARTIES**

6. Plaintiff Matthew Reardon resides in Davis County, Utah, and is an independent investigative journalist, a constitutional rights advocate, and author with his first book set to be published in April, 2025. Reardon actively engages in public transparency work
7. Defendant Layton City is a municipal entity and employer of certain defendants.
8. Defendant Layton Police Department is a division of Layton City.
9. Defendant City of Oxford, Mississippi is a municipal entity and employer of other named defendants.
10. Defendant Oxford Police Department is a division of the City of Oxford.
11. Captain Hildon Sessums is a sworn officer with Oxford PD, acting under color of law.
12. Chief Jeff McCutchen is Chief of Oxford PD, acting under color of law.
13. Lieutenant Riley Richins is a Layton PD officer who acted under color of law.

14. Mark Arrington is Layton City Prosecutor who interfered in GRAMA compliance.
15. Defendants JOHN DOES 1–139 are individuals whose names and capacities are presently unknown but who were direct recipients of a department-wide internal email sent by Defendant Lieutenant Riley Richins on February 5, 2025, containing false and defamatory information about Plaintiff. These individuals may have further disseminated or acted upon that information. Plaintiff will amend this Complaint to substitute their true names and capacities when ascertained.

#### **IV. FACTUAL ALLEGATIONS**

16. Plaintiff Matthew Reardon is a journalist, constitutional rights advocate, and author with a focus on, transparency through investigative journalism that targets police misconduct and government overreach.
17. Plaintiff is set to publish his first book in April, 2025 which is a non-fiction autobiography which details the outrageous acts of public corruption committed by public servants and officials and witnessed firsthand.
18. In prior years, Plaintiff was subject to retaliation from law enforcement in Mississippi, including Oxford Police Department and Lafayette County, for his constitutionally protected speech and activism.
19. Due to ongoing harassment and unlawful surveillance, Plaintiff adopted the pseudonym “Don Matthews” to protect his identity during public-facing advocacy and when filing records requests.

19. On February 1, 2025, Plaintiff relocated to Layton, Utah for a fresh start, continuing his public transparency work under the Don Matthews pseudonym.
20. Plaintiff used only the alias “Don Matthews” when submitting GRAMA requests or engaging with public officials.
21. No part of Plaintiff’s online presence—including YouTube, Facebook, or public records—contained identifying information tying “Don Matthews” to “Matthew Reardon.”
22. On or before February 4, 2025, Oxford Police Captain Hildon Sessums obtained Plaintiff’s private Utah address and real name.
23. That information could not have been obtained through lawful public channels; Plaintiff had taken precautions to maintain anonymity and had not provided identifying information to Layton City.
24. Plaintiff asserts under penalty of perjury, as supported by his sworn declaration (attached hereto as Exhibit A), that at the time Defendant Sessums disseminated Plaintiff’s Layton, Utah address on February 5, 2025, no legal, official, or publicly accessible database or source contained this address. Plaintiff had moved into the Layton address late on February 1, 2025, had not yet disclosed it to any public or private entity, nor even memorized it himself.
25. Defendant Sessums’s statement that Plaintiff’s address was obtained through “research” is therefore demonstrably false and materially misleading. Given these facts, Defendant Sessums necessarily obtained Plaintiff’s private residential address through either unlawful

surveillance, illegal access to confidential records, or unauthorized misuse of governmental resources.

26. On February 5, 2025, Sessums sent an unsolicited email to Layton Police Department containing Plaintiff's full legal name, Utah address, criminal history, and commentary suggesting Plaintiff was some type of danger and someone in need of monitoring.

27. Plaintiff asserts that Sessums unlawfully accessed Federal law enforcement databases or coordinated with other out-of-state agencies to obtain and disseminate this information.

28. On February 5, 2025, Lieutenant Riley Richins of Layton PD forwarded Sessums' email internally to 139 city employees.

29. In this department-wide internal email, Richins falsely stated that Plaintiff had been "arrested in 2017 for stalking the Mayor in Oxford."

30. That statement was categorically false. Plaintiff was arrested in 2017 for an incident involving an alleged private individual—not anything to do with the Mayor of Oxford.

31. Richins' statement constituted defamation per se, alleging criminal conduct involving a public official and was intended to incite fear or retaliation.

32. Plaintiff did not learn of this internal defamation until he received partial GRAMA records weeks later.

33. On February 20, 2025, Plaintiff visited Layton City Hall to follow up on an overdue GRAMA request.

34. Plaintiff was seeking police reports, 911 call logs, and officer body cam footage from a prior incident where he was recording video from a public sidewalk—none of which were being produced.
35. Layton PD refused to release any records unless Plaintiff showed government-issued ID, a condition not required under Utah GRAMA law.
36. Plaintiff met with City Prosecutor Mark Arrington to attempt to resolve the issue and at the request of a City Employee. During this meeting, Arrington implied that use of the alias “Don Matthews” could be criminal if used on official documents— despite no fraud, impersonation, or misrepresentation.
37. Arrington further stated he had to personally approve whether records would be released, contradicting prior communications from Layton’s records division.
38. Plaintiff waited hours in City Hall but was denied access to the requested materials.  
Arrington claimed he had other obligations and delayed the process until the following day.
39. On February 21, 2025, Plaintiff received a phone call from Defendant Mark Arrington just before 9:00 AM. During the call, Arrington referred to Plaintiff as “Matthew.” Plaintiff immediately challenged this, stating that he had used the name “Don” in all prior communications. Arrington responded that he knew Plaintiff’s legal name was Matthew Reardon from Lafayette County, Mississippi and referenced Plaintiff’s unrelated legal issues in Galveston, Texas—clearly indicating access to sensitive, non-public background information.

40. Arrington told Plaintiff that his requested records were ready but would only be released if Plaintiff came to the Layton Police Department in person and presented government issued identification. Plaintiff explained that he was uncomfortable doing so and requested that the records be sent electronically or picked up by an authorized third party.
41. Arrington denied both options, refusing to entertain this stating it would have to be the Plaintiff and he would have to show ID to get his requested records.
42. Plaintiff experienced this demand as a deliberate act of intimidation and retaliation for exercising his rights. The Galveston reference was especially alarming—Plaintiff had previously been lured to the Galveston, Texas police station under false pretenses to retrieve his car keys, only to be arrested based on a warrant from Lafayette County, Mississippi. That incident is currently the subject of pending litigation involving a multi-state conspiracy to silence Plaintiff.
43. Plaintiff understood Arrington’s call and conditions as part of a similar setup—an attempt to bait Plaintiff into appearing at the police station so he could be detained, harassed, or worse. Given the prior pattern of conspiratorial retaliation involving the same agencies, Plaintiff reasonably feared a repeat of that experience.
44. As a direct result of this coercive behavior, Plaintiff was forced to abandon his request for non-privileged, lawfully accessible public records—records that should have been delivered without condition.

45. Plaintiff continues to believe that this was an orchestrated act of retaliation coordinated by Lafayette County and Oxford law enforcement officials, aimed at silencing him and preventing the forthcoming publication of his non-fiction exposé detailing widespread corruption in Mississippi law enforcement.
46. These events violated Plaintiff's First Amendment rights—including the right to petition government and the right to freedom of the press—and have had a chilling effect on Plaintiff's ability to seek transparency and accountability from Layton City and other public entities.
47. On March 5, 2025, Mayor Joy Petro called Plaintiff in response to concerns raised via email.
48. During the call, Petro acknowledged that Plaintiff's concern about inconsistent ID requirements for GRAMA requests was legitimate and had been brought to the city manager.
49. Plaintiff explained how Arrington claimed to have identified him "through Facebook," which was impossible given the alias and Plaintiff's carefully protected identity.
50. Petro confirmed she had asked Arrington about this and relayed his implausible claim but noted that she lacked authority to investigate him due to city structure.
51. Plaintiff warned that Sessums' involvement, combined with Arrington's claim and Layton's reaction, indicated external interference and improper surveillance.
52. Petro said she would try to look into it but provided no follow-up and took no further action.



53. On March 13, 2025, Plaintiff submitted a detailed GRAMA request asking for call logs, emails, and communications between February 3 and March 13, involving his name or pseudonym.
54. Layton City failed to acknowledge the request until the legal deadline approached.
55. On March 25, the tenth business day, Layton City Recorder, Kimberly Reed, produced only a call log showing calls made to or from Plaintiff's own phone number.
56. Plaintiff had never requested that—he already had that information. The actual request sought internal phone records and communications.
57. She did produce a number of emails sent and received from Layton Employees involving the Plaintiff's Name, to include the email from Sessums February 5, 2025 and the Email from Richin's sent to Layton employees and local law enforcement the following day.
58. Layton City also withheld a known call recording involving Mark Arrington, which a records employee had previously acknowledged existed.
59. When Plaintiff followed up and pointed out the deficiencies, the City Recorder went silent and stopped responding entirely.
60. On March 27, 2025, Plaintiff confronted Defendant Chief Jeff McCutchen directly in a recorded phone call, explicitly detailing the impossibility of Defendant Sessums's lawful acquisition of Plaintiff's private residential address.
61. Despite Plaintiff's clear and specific allegation that Sessums had engaged in unlawful surveillance or unauthorized acquisition of Plaintiff's personal information, Chief McCutchen failed to deny the allegation, failed to provide any plausible explanation, and

explicitly refused Plaintiff's request to initiate an internal investigation into Sessums's misconduct.

62. Chief McCutchen's refusal to act demonstrates a deliberate indifference and tacit approval of Defendant Sessums's constitutional violations, further evidencing the existence of a widespread pattern, practice, and policy within the Oxford Police Department and its municipal governance to tolerate, condone, and facilitate constitutional abuses against individuals exercising protected First Amendment activities.
63. McCutchen's response confirmed Oxford PD's role in coordinating with Layton PD to surveil, discredit, and retaliate against Plaintiff across state lines.
64. On March 28, 2025, Plaintiff called Layton City again to follow up with Kimberly Reed about the missing items from his GRAMA request.
65. Plaintiff was informed by Legal staff that because of the pending lawsuit, he was only allowed to speak with Mark Arrington—a named defendant in the lawsuit—for anything involving GRAMA.
66. This created an unethical conflict of interest and effectively blocked access to a neutral records official.
67. Plaintiff left a voicemail for Arrington, reiterating that the City's conduct was retaliatory, obstructive, and legally indefensible.
68. Plaintiff declared that no further communication would occur and that he was proceeding with federal litigation.

## **V. CLAIMS FOR RELIEF**

### **COUNT I: First Amendment Retaliation (42 U.S.C. § 1983)**

**Brought against Sessums, Richins, Arrington, McCutchen, and John Does 1–139**

As detailed in ¶¶ 16–44, 46, ¶¶ 54–59, and ¶¶ 62–68 Defendants engaged in coordinated conduct including surveillance, false labeling, record obstruction, and coerced contact to retaliate against Plaintiff for protected speech, press activity, and public accountability efforts.

### **COUNT II: Fourth Amendment – Unlawful Seizure and Surveillance (42 U.S.C. § 1983)**

**Brought against Sessums and McCutchen (individual capacities).**

As described in ¶¶ 22–27 and ¶¶ 60–63, Sessums and McCutchen obtained and disseminated private, non-public information about Plaintiff without legal basis, violating his right to be secure in his person and effects. Specifically, Defendant Sessums illegally surveilled, obtained, and disseminated Plaintiff’s residential address, which was not accessible through any lawful or public means, constituting a blatant violation of Plaintiff’s Fourth Amendment rights. Plaintiff’s sworn declaration (Exhibit A) conclusively establishes that his residential address was acquired through unlawful means.

### **COUNT III: Fourteenth Amendment – Due Process & Equal Protection (42 U.S.C. § 1983)**

**Brought against Layton City, Richins, Arrington, and John Does 1–139.**

As shown in ¶¶ 22–31, 34–41, 44–68, Defendants applied standards Discriminatorily and used city authority to target Plaintiff without any lawful justification.

### **COUNT IV: Civil Conspiracy (42 U.S.C. §§ 1983, 1985)**

**Brought against Sessums, Richins, Arrington, McCutchen, and John Does 1–139.**

As demonstrated in ¶¶ 22–31, ¶¶ 35–44, and ¶¶ 56–68, these Defendants conspired to share Plaintiff’s private information and use internal channels to suppress, discredit, and deter him from future advocacy and transparency efforts.

**COUNT V: Defamation (State Law)**

**Brought against Sessums, Richins, and John Does 1–139 (individual capacities).**

As described in ¶¶ 25–31, Sessums and Richins published and circulated provably false statements about Plaintiff including allegations of stalking the Mayor, intended to damage reputation.

**COUNT VI: Invasion of Privacy (State Law)**

**Brought against Sessums (individual capacity).**

As set forth in ¶¶ 22–26, Sessums unlawfully accessed and disclosed Plaintiff’s private Utah location and background.

**COUNT VII: Intentional Infliction of Emotional Distress (State Law)**

**Brought against all Defendants (individual capacities).**

As laid out in ¶¶ 16–44 and ¶¶ 56–68, Plaintiff was targeted through defamation, surveillance, retaliation, and coordinated attempts to coerce him into police custody or force abandonment of lawful public requests.

**COUNT VIII: Monell Liability – Municipal Defendants (42 U.S.C. § 1983)**

**Brought against Layton City, Layton Police Department, City of Oxford, and Oxford Police Dept.**

As illustrated in ¶¶ 22–46, and 54–68, the municipal entities failed to properly train, supervise, or intervene to prevent constitutional violations perpetrated by their agents. Specifically, Chief McCutchen’s explicit refusal to investigate Defendant Sessums’s clearly unlawful conduct evidences deliberate indifference, willful blindness, and institutional complicity within the Oxford

Police Department, thereby establishing Monell liability against municipal Defendants City of Oxford and Oxford Police Department.

**COUNT IX: GRAMA Violations (Utah Code § 63G-2-101)**

**Brought against Layton City, Arrington**

As demonstrated in ¶¶ 32–44 and 53-68 Layton officials failed to comply with the Utah Government Records Access and Management Act and imposed unlawful barriers to Plaintiff’s request for public records.

**COUNT X: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (TORT OF OUTRAGE)**

**Brought against Sessums, McCutchen, Richins, Arrington, and John Does 1–138**

As detailed in ¶¶ 16–68, Defendants’ conduct—including unlawful surveillance; unauthorized disclosure and widespread dissemination of Plaintiff’s confidential residential address; deliberate defamation; harassment; retaliatory misuse of law enforcement resources; and intentional acts to intimidate, threaten, discredit, and silence Plaintiff—constitutes extreme and outrageous behavior that goes beyond all possible bounds of decency. Defendants acted intentionally and/or recklessly, knowing or having reason to know that their unlawful and retaliatory actions would result in severe emotional distress to Plaintiff. As a direct result of Defendants’ unlawful conduct, Plaintiff has suffered, and continues to suffer, severe emotional distress, humiliation, anxiety, trauma, fear, anger, damage to his reputation, and interference with his personal, professional, and familial life.

**VI. PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff respectfully requests the Court:

- A. Award compensatory damages in an amount to be determined at trial;
- B. Award punitive damages against Sessums, Richins, Arrington, and McCutchen;

- C. Declare Defendants violated Plaintiff's constitutional rights;
- D. Issue injunctive relief preventing further retaliation and compelling GRAMA compliance;
- E. Award attorney's fees and costs under 42 U.S.C. § 1988;
- F. Order service by U.S. Marshals pursuant to in forma pauperis status;
- G. Grant any other relief deemed just and proper.

Respectfully submitted this 31<sup>st</sup> Day of March, 2025

A handwritten signature in black ink, appearing to read 'M. Reardon', written over a horizontal line.

Matthew Reardon  
Plaintiff, Pro Se

# Exhibit A

## SWORN DECLARATION OF MATTHEW OLIVER REARDON Pursuant to 28 U.S.C. § 1746

I, **Matthew Oliver Reardon**, declare under penalty of perjury under the laws of the United States of America that the following is true and correct to the best of my knowledge and belief:

1. I am over the age of 18 and competent to make this declaration. I am the individual referenced in communications sent by Captain Hildon Sessums of the Oxford, Mississippi Police Department on February 5, 2025.
2. I moved into a residence in Layton, Utah late in the day on February 1, 2025. The residence is located at [REDACTED] W [REDACTED] N, Layton, UT 84041.
3. At the time I moved in, I had not submitted or disclosed that residential address to any person, agency, platform, or institution, public or private.
4. I had not yet updated or filed my new address with the Department of Motor Vehicles, the United States Postal Service, voter registration, tax filings, or any other governmental record-keeping agency.
5. I had not mentioned or published the address on any public platform, social media account, video, form, or document—nor had I provided it to any individual outside of the leasing process.
6. In fact, I did not have the address memorized and routinely had to refer back to a text message from my landlord to retrieve it. This further affirms that I could not have casually or inadvertently disclosed the address myself.
7. At no point prior to February 5, 2025, did I provide my new Layton address to any law enforcement agency, including but not limited to the Layton Police Department or any entity in Utah or Mississippi.
8. Nonetheless, on February 5, 2025, Captain Hildon Sessums of the Oxford Police Department emailed my full residential address to multiple officials within the Layton City Police Department

and Layton City government. The email falsely stated that “from our research, his current address is...”—despite the fact that no such research could have uncovered this address through any legal, official, or public means.

9. It is therefore my firm belief and sworn assertion that Captain Sessums could not have lawfully obtained this address through any public or law enforcement database, and that the address was either:

- Illegally acquired through surveillance, unlawful access, or misuse of government resources;
- Provided by an individual acting outside the bounds of law enforcement data protocols;

10. The address in question was then further disseminated by Lt. Riley Richins of Layton Police Department to over 100 recipients in a mass email, perpetuating a defamatory narrative and unlawfully broadcasting my private information.

11. I make this declaration in support of a federal civil rights complaint and related formal grievances involving violations of my Fourth and Fourteenth Amendment rights, and in response to targeted retaliation against my constitutionally protected First Amendment activities.

Executed this 31<sup>st</sup> day of March, 2025

at 12:17 PM.



Matthew Oliver Reardon



# Exhibit B

**From:** Hildon Sessums <hsessums@oxfordpolice.net>

**Sent:** Wednesday, February 5, 2025 8:09 AM

**To:** Mark Chatlin <mchatlin@laytoncity.org>; Travis Lyman <tlyman@laytoncity.org>; Riley Richins <rrichins@laytoncity.org>; Allen Swanson <aswanson@laytoncity.org>

**Subject:** Matt Reardon (1st Amendment Auditor)

Good morning,

My name is Hildon Sessums, and I'm a Captain with the Oxford, MS, Police Department and a graduate of the FBI National Academy.

I'm reaching out regarding someone your department recently encountered. Matthew Oliver Reardon (DOB 3/24/1987) is a former Oxford resident, a convicted felon, and a persistent issue for our department. It appears he has now moved to your city.

We discovered a YouTube video in which he conducted a "First Amendment audit" at Zions Bank in Layton. Given his history with us and in Texas, I wanted to share some background information. From our research, his current address is:

W N, Layton, UT 84041

Below are just a few of the links to previous incidents involving him:

- [Oxford Eagle: Reardon Sentenced to 2 Years in Prison](#)
- [Oxford Eagle: Prior Incident](#)
- [WREG: Man Banished from Lafayette County](#)

Please let me know if I can provide any additional information. I'd be happy to assist in any way.



**Hildon Sessums**

*Captain*

**Oxford Police Department**

9 Industrial Park Drive

Oxford, MS 38655

t: 662-232-2400

f: 662-232-2314

# Exhibit C

**Subject:** Matthew Reardon - First Amendment Auditor

**From:** Riley Richins <r-richins@laytoncity.org>

**Date:** 2/5/2025, 9:46 AM

**To:** "PD Sworn" <PDSworn@laytoncity.org>, "PD Records"

<PDRecords@laytoncity.org>, "PD Dispatch" <PDDispatch@laytoncity.org>,

kkuehn@laytoncity.org, kwaters@laytoncity.org, lmurdock@laytoncity.org,

jwheatley@laytoncity.org, sking@laytoncity.org, eleavitt@laytoncity.org,

dippolito@laytoncity.org, dtarantino@laytoncity.org, sporter@laytoncity.org,

ckennedy@laytoncity.org, jcampbell@laytoncity.org, sjohnson@laytoncity.org,

dmadsen@laytoncity.org, pball@laytoncity.org, mneugebauer@laytoncity.org,

swillard@laytoncity.org, kericksen@laytoncity.org, sboelter@laytoncity.org,

bcanard@laytoncity.org, cteague@laytoncity.org, solsens@laytoncity.org,

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jfouts@laytoncity.org, jrussell@laytoncity.org, mkeene@laytoncity.org,  
jpadilla@laytoncity.org, jtyner@laytoncity.org, hhanks@laytoncity.org,  
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ealvarado@laytoncity.org, bburgess@laytoncity.org, gnewbold@laytoncity.org,  
jagullar@laytoncity.org, jrangassamy@laytoncity.org,  
bdickman@laytoncity.org, clarson@laytoncity.org, dchecketts@laytoncity.org,  
bctaylor@laytoncity.org, mpgraham@laytoncity.org, ehancock@laytoncity.org,  
tnelson@laytoncity.org, tfoster@laytoncity.org, amckinley@laytoncity.org,  
dslavens@laytoncity.org, nhoughtalen@laytoncity.org,  
cbradley@laytoncity.org, dmccobb@laytoncity.org, lrubio@laytoncity.org,  
rhigley@laytoncity.org, dgoodale@laytoncity.org

By way of information, we've received information that a "First Amendment Auditor" Matthew Oliver Reardon (3/24/87) has move from Oxford, Mississippi, to Layton City. His address is [REDACTED] W [REDACTED] N, Layton. Oxford PD has reported Reardon as a "persistent issue" for their department.

In 2017, Reardon was arrested for stalking the Mayor in Lafayette County. A restraining order was issued. Then in 2022, Reardon was arrested and charged with aggravated stalking when he violated the restraining order by walking into the City Hall with a video camera and walked toward the Mayor's office.

Yesterday, Reardon did a "Silent Audit" at Zions Bank on South Fort Lane here in Layton City. Our Officers responded and handled the situation professionally. Reardon was even appreciative of their professionalism and gave our Officers a "Pass". This serves as a good reminder to respond appropriately to these "auditors" and be professional while upholding the public's rights.

Here's the YouTube Link to yesterdays encounter.

<https://www.youtube.com/watch?v=OzDb1i4cZ9s>

### **Riley Richins**

Lieutenant | [richins@laytoncity.org](mailto:richins@laytoncity.org) | [www.laytoncity.org](http://www.laytoncity.org)



Police Department • 429 N Wasatch Dr • Layton, UT 84041 • Phone: (801) 336-3415 • Fax: (801) 336-3494

