



## OFFICE OF THE DISTRICT ATTORNEY GENERAL

GLENN R. FUNK  
*District Attorney General*

September 30, 2021

Lauren Topping  
General Counsel  
Bureau of Ethics and Campaign Finance  
404 James Robertson Parkway, Suite 104  
Nashville, TN 37219

RE: Jonathan Hall Sworn Complaint

Dear Ms. Topping:

My office has completed its review of the sworn complaint filed by Ms. Neal and Mr. Philip regarding irregularities in Metro Councilmember Jonathan Hall's campaign finance disclosures. On or about July 22, 2021, I mailed a letter with the sworn complaint attached to Mr. Hall's home address and requested he respond to many of the allegations. I received no response. Approximately a month later, I asked Steve Turner, an investigator in my office, to hand-deliver copies of my letter and the sworn complaint to both the Metro Council office and Mr. Hall's home. To date, I have received no response.

Based on my review of the contents of the sworn complaint and a reading of the applicable statutes (and without any response or explanation from Mr. Hall), it is my opinion that the allegations contained therein have merit on their face. I composed a memorandum to General Funk providing my analysis of the issue, recommending that the sworn complaint be forwarded to your office to consider filing a show cause motion against Mr. Hall to address the claims and determine whether any civil penalty might be appropriate. General Funk then directed me to forward the memorandum to your office.

I am including a copy of the sworn complaint, my letter to Mr. Hall, and a copy of my memorandum to General Funk with this letter for your review. Please contact me if I can be of further assistance or can provide further information.

Sincerely,

A handwritten signature in blue ink that reads "Brian Ewald".

Brian Ewald  
Assistant District Attorney General

cc: William Young, Executive Director, Bureau of Ethics and Campaign Finance  
Glenn Funk, District Attorney General, 20th Judicial District