

September 13, 2022, Tuesday

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**RE: NOTICE OF CLAIM AGAINST THE STATE OF ARIZONA, STATE SUPREME COURT OF ARIZONA, STATE "EMPLOYEE: WILLIAM J. O'NEIL, DIRECTORS AND OFFICERS OF THE STATE BAR OF ARIZONA**

**DATE OF OCCURRENCE** – March 7, 2016, 4/19/2016 and Ongoing

**TIME OF OCCURRENCE** – UNK

**INJURED PARTY:** Jeffrey Dean Moffatt ("Moffatt") Arizona Lawyer's License issued 2002 by the State Supreme Court of Arizona and 50% Spousal Community Property.

**LOCATION OF OCCURRENCES** – State of Arizona, State Supreme Court of Arizona, State "Employee William J. O'Neil and the State Bar of Arizona.

**CLAIM AMOUNT** - \$20 million, pursuant to ARS 12-821

This "Notice of Claim" is against the State of Arizona, the State Supreme Court of Arizona ("Court"), and State Employee: William J. O'Neil. Directors and Officers of the State Bar of Arizona.

All parties listed above have failed to uphold First Amendment Constitutional Protections for Arizona Lawyer's including Moffatt.

Furthermore, all parties listed above, have also created a pattern and practice scheme with depriving Constitutional Equal Protections for Arizona Lawyer's including ("Moffatt"), among other issues.

Intended Discrimination with Depriving Constitutional Protections and Constitutional Rights against Arizona Lawyers including Moffatt, is a breach by Arizona, because Arizona certified to the Federal Government, in order to be in receipt of Federal Financial Assistance, Arizona would NOT have Discriminatory practices.

This Notice of Claim is to give Arizona an opportunity to right its legendary constitutional wrongs against Arizona Lawyer's including Moffatt, because the ("Court") since approximately 2010 has exceeded its constitutional *jurisdiction* under **Arizona Constitution Article 6 Section 5**, by creating a Fourth Judicial Branch of Government, to mean an Administrative State Quasi-Judicial "Hearing Panel." The same "Hearing Panel," created and pursuant to Supreme Court Rule, Rule 52, that is inherently in conflict Arizona Constitution.

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**Supreme Court Rule, Rule 52:** "Hearing Panel," enacted under Administrative Order # 2010 by: Rebecca White Berch, is defective on its face, unlawful and unconstitutional.

The Decision and Order Imposing Sanctions against Moffatt on 3/7/2016, was unlawful and unconstitutional because Rule 52 was created without Governor, Legislature or Voter Approval.

("Moffatt") is just one of the many thousands of Arizona Lawyer Victims (Fraudulently) Sanctioned by a Non-Jury "Hearing Panel" created under Rule 52 without constitutional jurisdiction prescribed in **Arizona Constitution Article 6 Section 5**.

**Supreme Court Rule, Rule 51:**

The ("Court") has exceeded its constitutional authority for Judicial *Appointments* that is inherently in conflict with **Arizona Constitution Article 6 Section 7**, thereby creating an unaccountable judicial member under Supreme Court Rule, Rule 51.

*Application of Rule 51* must be rescinded because it empowers an “Unconstitutionally Seated Judge,” not to uphold constitutional rights and constitutional protections of Arizona Lawyers including Moffatt. The “Unconstitutionally Seated Judge,” William J. O’Neil, (“O’Neil”) who operated under Rule 51 did not have a valid Loyalty Oath of Office as required under: Ariz. Rev. Stat. Ann §38-231(E) and Ariz. Rev. Sta. Ann §38-231(B). ...

Rule 51 also permitted Unconstitutionally Seated Judge (“O’Neil”) not to uphold statutory criminal laws nor civil laws. See in Supreme Court Administrative Order # 2009-73, Attorney Discipline Task Force, Final Order dated 06/30/2010, R-09-0044.

Application of Rule 51 operates in concerted efforts with Rule 48, to mean Sui Generis.

Persons such as (“O’Neil”) appointed under Rule 51, imposed an application of Supreme Court Rule, Rule 48, which was nothing more than Sui Generis proceedings against Arizona Lawyers including Moffatt. Rule 48 is unlawful and unconstitutional. Because there can be NO Taking of a Lawyer’s License that has become a vested property right, including Moffatt Lawyers License only issued by the (“Court”), in 2002.

The application of Rule 51 must be invalidated because it empowers a non-constitutionally seated judge to act in adversarial matters, in violation of Lucia vs SEC. U.S. Supreme Court Docket #17-130, in violation of other State and Federal constitutional law and along with, violation of the Unclean Hands Doctrine.

Persons appointed under Rule 51 are Hearing Officers also known as an Administrative Law Judges (ALJ) who only handle administrative disputes and not constitutional challenges.

ALJ’s are not constitutionally seated Judicial Public Officials.

Yet Arizona’s State Employee William J. O’Neil, from approximately 2010-2021, committed Public Fraud with False Impersonations by pretending to be a State Supreme Court of Arizona Judge-Justice.

During a CLE Training Class, O'Neil was introduced as a Judge with the State Supreme Court of Arizona and did not denounce.

Persons appointed under Rule 51, like O'Neil, are not Appointed in compliance with State and Federal Constitutional laws, which presents an inherent Conflict of Interest, that is a problematic issue with violating Appointment Clauses and Separation of Powers.

Persons unlawfully Appointed under Rule 51, including O'Neil, who then prosecute and convict persons, are not constitutionally approved by Arizona Legislatures or the Governor's first right for Appointment.

Rule 51 conflicts with **Arizona Constitution Article 6 Section 7** that reads in part: "The Supreme Court shall appoint a clerk of the court and assistants thereto who shall serve at its pleasure, and who shall receive such compensation as may be provided by law."

The supreme court shall appoint an administrative director and staff to serve at its pleasure to assist the chief justice in discharging his administrative duties."

The United States of America's Criminal Justice System currently does not allow ANYONE to be criminally charged, prosecuted or convicted within ANY State based only on Policy-Guideline Rules that are administrative in nature only and NOT adopted by State or Federal criminal statutory laws.

However, It is apparent that **Administrative Order # 2009-73, Final Order dated 06/30/2010, R-09-0044**, stripped Arizona Lawyers Licenses including Moffatt who brought fourth constitutional challenges against Rule 52, Rule 51, Rule 48 and Rule 32 applications, as well as Rule 8.4(b). These same rules that lack constitutional infrastructure compliances.

#### **Supreme Court Rule, Rule 48:**

Rule 48 is unlawful and unconstitutional because when criminally charging Arizona Lawyers including Moffatt, conflicts with Arizona Criminal Statutory laws already

enacted. Rule 48 uses a Sui Generis proceedings to investigate, criminally charge and prosecute Arizona Lawyers.

Sui Generis proceedings against vested property rights of Arizona Lawyers licenses including Moffatt, conflicts because Arizona Lawyers and including Moffatt do not waive their Constitutional Protections to be admitted before the ("Court"). See **Arizona Const. Art. 6 Section 7 Appointments Clause** and **Arizona Const. Art 6 Section 5 Jurisdiction**.

**Supreme Court Rule, Rule 32:**

The ("Court") has control and direction over the State Bar of Arizona and as such the State Bar of Arizona is an Arm of Arizona Government.

Unfortunately, Rule 32, is inherently in conflict with **AZ Const. Art. 6 Section 3**, that also presents a conflict with Separation of Powers.

Because **AZ Const. Art. 6 Section 3** only permits the ("Court"): "The supreme court shall have administrative supervision over all the courts of the state." ...

Permitting said Bar to investigate and criminally charge Arizona Lawyers including ("Moffatt"), is unlawful and unconstitutional because the Bar is NOT a Court of Record as defined in **Arizona Const. Art. 6 Section 3**.

Rule 32 has NOT been adopted or codified into ANY Arizona Criminal or Civil Statutory Laws. Rule 32 has NOT been approved by Arizona Legislatures or ANY Arizona Governor.

The *State Bar of Arizona* is only recognized by Arizona State and defined as a 501 (c)(3) State Non-profit Corporation. Along with Federal Recognition by the U.S. Department of Treasury – IRS as a 501(c)(6) Federal Tax Exempt Corporation.

The ("Court) having control over corporate entity the State Bar of Arizona imposes an inherent "conflict of interest" with both state and federal constitutional Separation of Powers.

Control and direction by the (“Court”) also violates the Sherman Antitrust Act, because Moffatt was mandated to join the union (SBA).

Together the State Supreme Court of Arizona and the (SBA) have also created a Monopoly in violation of the Sherman Antitrust Act.

**Rule 8.4(b) imposed as a criminal charge against Moffatt in November 2015:**

The (“Court”) has control and direction over Rule 8.4(b), under State Bar of Arizona, Ethical Rules of Professional Conduct.

Moffatt was fraudulently criminally charged with alleged Rule 8.4(b) claimed committed criminal conduct, by the State Bar of Arizona, November 2015, using California Penal codes.

Prior to Moffatt being criminally charged under Rule 8.4(b) he was investigated also by the State Bar of Arizona.

Rule 8.4(b) has not been adopted or codified into ANY Arizona Criminal Statutory Law.

Rule 8.4(b) also has NEVER been approved by ANY Arizona Legislatures or Arizona Governor.

Yet, Rule 8.4(b) charged against Moffatt in November 2015, caused a Fraudulent and tainted Final Judgment and Disbarment Order that was issued by the State Supreme Court of Arizona Presiding Disciplinary Judge William J. O’Neil, April 19, 2016.

O’Neil himself was unconstitutionally seated under Rule 51. The same Rule 51 also unconstitutional, because of NOT being adopted into law and NOT approved by a majority of Arizona Legislatures or ANY Governor.

O’Neil did engage in criminal misconduct via his False Impersonation of a Judge-Justice of the Supreme Court. Because O’Neil’s conduct was intentional, dishonest,

fraud, deceit and misrepresentation by conducting including, donning a judicial robe and purporting to preside over alleged criminal cases under Rule 8.4(b), including (“Moffatt”).

Arizona’s Bar rules require that the action of the forum state to be followed in Arizona. In Moffatt’s case, the New Mexico bar exonerated Moffatt, and found no attorney client relationship, which should have been followed in Arizona, which was not.

Arizona applied felony criminal statutes of California, without Moffatt being given a jury of his peers. Arizona went past the statute of limitations that would have applied in Arizona, California and New Mexico.

## **STATE SUPREME COURT OF ARIZONA’S FAILURE TO UPHOLD FIRST AMENDMENT PROTECTIONS**

The State Supreme Court have failed to uphold guaranteed Constitutional First Amendment Protections for Arizona Lawyer’s and including Moffatt. Arizona has condoned O’Neil and the Bar not to uphold constitutional protections, by failing to implement First Amendment protections for Arizona Lawyer’s and including Moffatt.

Material evidence of the State’s failure to uphold guaranteed Constitutional First Amendment Protections as follows:

The Judiciary Committee House of Representatives within in its Findings Report **1/4/2016**, recommended an Order to the State Supreme Court of Arizona, to implement First Amendment Protections to Arizona Lawyers.

Additionally, the Judiciary Committee House of Representatives introduced HCM 2002 bill with 52nd Legislature, Second Regular Session (2016). The memorial proposed bill failed in the Senate on third read with a vote of 13 ayes, 15 nays and 2 not voting to implement First Amendment Protections, for Arizona Lawyer’s.

The State of Arizona receiving Federal Financial Assistance certifies to the Federal government to receive Federal Funds not to have a pattern and practice of inducing discriminatory treatment. Failure by the State of Arizona NOT to uphold federally

guaranteed constitutional First Amendment Protections is a systemic inherent conflict and induced discrimination against Arizona Lawyers including Moffatt.

The intentional induced discrimination by the State against Moffatt with turning blind eyes towards Disparate and Discriminatory Treatment, is a miscarriage of justice while Arizona receiving Federal Financial Assistance is prohibited conduct.

**Two examples of Failure to Uphold First Amendment Constitutional Protections:**

**1).** Moffatt spoke out and opened in U.S. Supreme Court Case, Docket # 15-754. Moffatt was threatened by William King, Bar Counsel, if Moffatt did NOT remove the case Moffatt would be Disbarred.

Read the first TWO Questions Presented to the US Supreme Court, that Moffatt submitted including advocating for Women's Constitutional Rights and Protections under Roe v. Wade. **Source:** <https://lawofficesofjeffreymoffatt.com/wp-content/uploads/2015/12/31677-pdf-Adkins.pdf>

In Moffatt's U.S. Supreme Court Case Docket #15-754 the case gained International and Domestic attention.

**April 18, 2016,** Monday, Moffatt's Petition for Rehearing before the U.S Supreme Court was denied.

**April 19, 2016,** Arizona Disbarment Order was issued by State Employee: William J. O'Neil. Corresponding with March 7, 2016 Decision and Order for Sanctions.

**2).** **October 13, 2013,** Prospect Legal Client reached out to Moffatt over Facebook Social Media Platform. Prospect refused to pay hour and half Consultation Fee of \$75.00, related to Federal IRS Tax Dispute. Moffatt requested a Barter in Exchange "PIC."

**April 19, 2016,** Arizona Disbarment Order was issued by State Employee: William J. O'Neil, non-Judicial Public Official, operating under authority of Supreme Court Rule, Rule 51.



Disbarment Order April 19, 2016, corresponding and having a nexus with March 7, 2016 Decision and Order for Sanctions. But O'Neil crossed state lines outside his Jurisdiction and even charged Moffatt to have violated California Penal Code §647.

O'Neil even convicted Moffatt and claimed his conduct was of criminal conduct under Rule 8.4 (b) Violation. Yet O'Neil convicted Moffatt past Statute of Limitations, while exceeding both jurisdiction and authority.

## **UNLAWFUL**

It is unlawful for the Supreme Court of Arizona ("Court"), to impose Rules that conflicts with Arizona Constitution and prescribed by laws.

It is unlawful and fraudulent to investigate, criminally charge, prosecute and convict ANY person(s) including ("Moffatt") on "RULES" NOT adopted by Arizona Criminal Statutory Laws.

It is unlawful for the Supreme Court of Arizona to work in a (Public Corruption Scheme) with any corporation and including implied state entity the State Bar of Arizona that specifically targets a group of people who are protect class of people such as: Disabled, Women, Minorities, Veterans and LGBTQ also defined as sole practitioners.

It is unlawful for the State of Arizona and the State Supreme Court, to impose systemic discrimination against Disabled, Women, Minorities, Veterans and LGBTQ people.

## **TORTIOUS INJURIES**

("Moffatt") who received his license to practice law by the State Supreme Court of Arizona in 2002 has suffered ongoing constitutional irreparable harms since 2016 that cause our founding fathers to roll over in their graves.

- Malicious Prosecution and Conviction on "Rules" NOT adopted by Arizona Criminal Laws;

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- Malicious prosecution regarding a non-legal prospect client, whom is documented to have tried to extort Moffatt in his Federal Congressional run, and Moffatt's wife in her State Senate run;
  - Malicious prosecution regarding a non-legal client, whom resided in the state of New Mexico, whom New Mexico already adjudicated the New Mexico resident was not a legal client in 2014;
  - Malicious prosecution regarding a non-legal client, despite the jurisdiction of ALJ O'Neil would only apply to legal clients.
  - Unlawful Taking-Seizure License (Lawyer's Vested Property Right - License) 4th Amendment Violation;
  - Fraudulent Final Judgment & Disbarment Order, dated April 19, 2016, issued by only mere State Employee: William J. O'Neil with corresponding Fraudulent Decision and Sanction document dated March 7, 2016. O'Neil defined contracted State Employee in Supreme Court Administrative Order #2010-136;
  - State Employee O'Neil committed False Impersonations as a State Supreme Court of Arizona Judge. Findings reveal O'Neil only a mere employee Hearing Officer aka Administrative Law Judge (ALJ);
  - Payroll and other documents findings revealed O'Neil was only a mere Arizona State Employee. O'Neil was handling cases including Moffatt's while dressed in judicial robes and seated on the Supreme Court of Arizona Bench portraying to be a judge-justice. At no time had O'Neil held a Judge-Justice seat on the Arizona Supreme Court bench pursuant to the Arizona Constitution. As a result, at no time was O'Neil authorized to act as a Judge-Justice on the Supreme Court bench;
  - Fraudulent Invalid Loyalty Oath of Office-False Impersonations of Supreme Court Judge-Justice. See Forensic Report - <https://lawofficesofjeffreymoffatt.com/wp-Forensic-Expert-Report-WM-J-ONEils-Invalid-Oath.pdf>

- Fraudulent affixed Robo Signatures on Disbarment Order April 19, 2016 and Decision document March 7, 2016.
- Fraudulent Investigation Report, unsigned, lacks authentication and was undated exceeded jurisdiction and authority;
- Intentional illegal Restraint of Trade (Fraudulent Federal Reciprocal Disbarments);
- Intentional illegal Restraint of Trade (Fraudulent State Reciprocal Disbarment with State of California Department of Insurance);
- Intentional Targeting small law firm businesses;
- Deprivation of Rights under 42 USC 1983;
- Disparate Treatment;
- Defamation Per Se (Libel);
- First Amendment Violation;
- Sherman Antitrust Act Violations (Court Created Monopoly) problematic Conflict of Interest - Separation of Power violations (Treble Damages);
- Violation of Constitutional Right to Work under Arizona Constitution Article 25 Section O; **and**
- Violation of Eighth Amendment (Excessive Fine imposed). Revocation-Disbarment of Arizona Lawyers license, vested Property Right.

Arizona handling of this Tort Claim now and conceding that O'Neil was not constitutionally seated in compliance with Arizona Constitution will prevent a grave tidal wave of cases to possibly unravel each and every case ever touched by O'Neil.

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Handling of this Tort Claim now, will also prevent an embarrassment to Arizona just before November 2022 Elections.

2002 (“Moffatt”) in acceptance of his State lawyer’s license as counsel and court officer before the (“Court”), did not waive ANY of his constitutional protections and rights in order to be admitted.

2016 Federal Courts domino miscarriage of justice affects began from Arizona Employee (O’Neil), who did not have a valid “Loyalty Oath of Office,” dressed in Supreme Court of Arizona judicial robes and seated on the Supreme Court judges chair behind the bench. O’Neil committed actual False Impersonations as a Supreme Court Judge from 2010-2022.

Beyond unfortunate, Federal Courts Moffatt’s was admitted also to practice law gave complete deference to the State of Arizona. The pattern and practice of deference was through mistake and inadvertence, because Federal Courts had no idea O’Neil and the State Bar, were committed fraud upon Federal Courts.

2021 fast forward now one of the darkest times with ongoing constitutional irreparable harms stems from Moffatt’s being criminally charged via a Grand Jury Criminal Indictment within the United States District Court –Central District, Docket # 2:21-cr-00335-JAK-1. Second criminal case against Moffatt was filed on July 23, 2021 and September 3, 2021 Moffatt was arrested.

Indictment reads in pertinent part against Moffatt on Page 1: “MOFFATT was disbarred from the State Bar of Arizona ... This statement (pleading) is fraud upon the court because the actual Fraudulent Final Judgment and Disbarment Order dated April 19, 2016, was from William J. O’Neil, your State Employee. Linked also with O’Neil and the Hearing Panel’s Decision for Sanctions dated March 7, 2016.

O'Neil did NOT have jurisdiction or authority to criminally prosecute and convict ("Moffatt"), even under California Penal Code §647, A.R.S. §13-324(A) and 8.4(b) Ethical Rule (ER) of the State Bar of Arizona. See fraudulent document dated March 7, 2016 titled: Decision and Order Imposing Sanctions against Moffatt.

### **CALIFORNIA PENAL CODE §647**

*California Penal Code §647* has subparagraphs (a) through (m). PC §647 relates to solicitation with a prostitute.

The Supreme Court "Hearing Panel," Sanctioned Moffatt under *CA Penal Code §647*, but did not provide any specific subparagraphs that Moffatt supposedly violated within alleged Decision and Order Imposing Sanctions dated 3/7/2016. The elements necessary for this charge were not pled, much less satisfied.

The "Hearing Panel" who issued the Decision and Order Imposing Sanctions, 3/7/2016, O'Neil crossed State lines to prosecute Moffatt under *California Penal Code §647*, when O'Neil had no authority to prosecute California criminal law in Arizona.

### **RULE 1.8(j)**

A long-standing ethics **Rule 1.8(J)** allows Arizona Lawyers to have sexual relations with their client[s] as long as a "consensual sexual relationship existed between them when the client-lawyer relationship commenced" pursuant to the State Bar's Ethical Rule 1.8(j), also known as ER 1.8(j). See <https://www.azbar.org/for-lawyers/ethics/rules-of-professional-conduct/>

**Simply asked:** If "consensual sexual relationships" with Arizona Lawyer's and a prospect legal clients, is permitted under **Rule 1.8(j)**, then WHY would an alleged solicitation with a non-legal client determined by New Mexico be a criminal offense against Moffatt under **Rule 8.4 (b)**, against Moffatt?

But in the eyes State Employee O'Neil and the Hearing Panel, they moved with a Decision to Impose Sanction for Disbarment, dated 3/7/2016, against Moffatt, for

the mere asking of a "PIC," from supposed New Mexico Prospect Legal Client Lisa Childers.

Yet, the State of New Mexico Disciplinary Board - State Supreme Court of New Mexico, Dismissed Childers Complaint, against Moffatt for lacking jurisdiction for Solicitation.

As such why didn't O'Neil, follow Reciprocal Discipline with the State of New Mexico Disciplinary Board? Dismissal.

However, O'Neil continued pursuing and harassing Moffatt, with Exceeding Jurisdiction, Authority and past the Statute of Limitations on claimed Solicitation. State Employee O'Neil, Arizona, the State Supreme Court of Arizona and the State Bar of Arizona, wiped out Moffatt's entire professional legal career as an Arizona Lawyer, Lawyer in multiple Federal Courts and caused the Revocation of Moffatt's State of California Insurance Agent License.

### **EXAMPLES (HOW) ARIZONA STATE EMPLOYEE O'NEIL SHOWED "FAVORITISM" WITH OTHER ARIZONA LAWYER'S BUT "DISPARATE TREATMENT" AGAINST MOFFATT**

O'Neil's FAVORITISM TOWARDS AN ATTORNEY who killed a Woman while Driving Drunk – according to reliable sources Perry was allowed to Practice Law from Prison.

Sonoran News, reported "Christopher Perry - he's no longer a lawyer but just plays one in the judicial system. Perry, an attorney that assisted in #Judge O'Neil's mother in law's short sale that resulted on #O'Neil getting the property, was allowed to practice law while in prison for killing a person while Perry was drunk.

After the retroactive disbarment order, Perry is practicing law at Shapiro, Van Ess, Sherman & Marth, LLP, as O'Neil and the Arizona State Bar turn a blind eye. He continues to be listed as an active attorney. The website contains up to date information about their activities." *See* Source and scroll down to Christopher Perry at - <http://www.sonorannews.com/archives/2014/140827/news-clear-bench.html>

O'Neil's Sexual Exploitation Favoritism, towards Attorneys that he did "NOT" move for Disbarment was a disgrace.

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O'Neil's favored Attorneys, even admitted within Court Records: channeling the dead to communicate in exchange for Sex, admission of Sex with Clients, Oral Sex with Clients, among other actual Sex Exploitation towards vulnerable legal clients and court clerks....

- **CHARNA JOHNSON**

Charna Johnson is an attorney who was found to have had sex with a client, as well as channeling the dead to communicate to clients. The bar also reported, "Johnson represented her client in a divorce proceeding and drafted a will, leaving all the assets for herself." Despite the fact that "Five aggravating factors were found: prior disciplinary offenses, dishonest or selfish motive, submission of false evidence, refusal to acknowledge the wrongful nature of conduct and substantial experience in the practice of law," Johnson was merely suspended for one year.

***See Source :***

<http://www.azbar.org/newsevents/newsreleases/2010/10/suspensionrecommendedforattorneywhowasallegedtohavechanneledthedead>

- **JUDGE TED ABRAMS FELLOW JUDGE TO O'NEIL**

O'Neil treated his fellow judge Ted Abrams. O'Neil merely suspended him for two years and barred him from being a judge. Here is Abrams' extensive history of sexual harassment, as reported by The Arizona Republic:

During a 14-month period, the judge sent the unidentified public defender at least 28 voicemails and 85 text messages, many of which were sexually suggestive (at least one was, he admitted, "obscene," and described a sex act he wanted to perform on her), repeatedly pressured her for sex, made slurping noises and at one

point fondled her buttock. In response, the public defender said she wasn't interested, repeatedly told him that it would be inappropriate for them to have a relationship because he was a judge, she worked in his courtroom and he was married. She called him "crazy and disgusting."

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Abrams, 47, also had a sexual relationship with another attorney, a private defense lawyer who appeared in his court, and he sent sexually explicit e-mails to a third attorney, an assistant city prosecutor who appeared in his court.

The state bar brief said the judge "victimized a young lawyer for his own personal gratification and when she did not enjoy, welcome or otherwise relent to his constant requests for sexual contact, he berated and humiliated her from the bench during a jury trial."

The victim also said Abrams told her that it would not be good for her career if she rejected his advances. After the short suspension, it appears that he is about to be reinstated to the Arizona bar. Abrams not Disbarred and Lawyer's license reinstated in 2017.

See Source: <http://archive.azcentral.com/news/articles/20110604arizona-supreme-court-suspends-ted-abrams.html>

- **MATTHEW SCHULTZ**

Attorney Matthew Schultz admitted he had a sexual relationship with a client, and was just suspended for one year.

See Source:

<http://www.azbar.org/newsevents/newsreleases/2014/08/matthewsschultzsuspension/>

- **ROBERT STANDAGE**



Government attorney Robert Standage... actually did send sexual images and videos to an existing client. He was already on probation for a previous incident, but Judge O'Neil merely suspended him for two years. His attorney Scott Rhodes. See Court Case NO.: PDJ 2015-9007 – SBA File #14-0367 Filed 06-29-2015. Standage has since been reinstated as an Arizona Lawyer.

Read Court Document

<http://www.azcourts.gov/Portals/101/Standage%20Web.pdf>

Credit Above Sources Rachel Alexander

<http://townhall.com/columnists/rachelalexander/2016/07/05/how-state-bars-are-taking-down-conservative-attorneys-n2187819>

- **Juan Martinez**

“Once again, the public has been denied access to hundreds of pages from an investigation into sexual harassment claims against Deputy Maricopa County Attorney Juan Martinez.

Presiding Disciplinary Judge William J. O'Neil denied a request by The Arizona Republic and other media for the records to be unsealed, two months after new Maricopa County Attorney Allister Adel said she was prepared to release them if the judge granted the motion.

According to O'Neil's written denial, the investigation is a human resource record that the Maricopa County Attorney's Office and State Bar of Arizona had previously agreed would be sealed.” **Source:**

<https://www.azcentral.com/story/news/local/phoenix/2020/01/07/juan-martinez-maricopa-county-sexual-harassment-investigation-records-denied/2837644001/>

## **CONCLUSION**

If O'Neil had determined Moffatt's conduct was “illegal criminal conduct,” than O'Neil should have referred to proper law enforcement authorities for prosecution, but O'Neil did NOT.

O'Neil instead decided to prosecute Moffatt himself not giving a damn with Exceeding Jurisdiction, Authority and even past the Statute of Limitations.

When ("Moffatt") filed a motion to have O'Neil Recuse, himself off Moffatt's case should have done so immediately, since O'Neil did not have jurisdiction to prosecute and convict (Moffatt") on alleged criminal conduct for incident in year 2013, with a NON-LEGAL CLIENT, resident within the State of New Mexico; that resident of New Mexico was criminally charged for extortion against Moffatt, and election tampering (Moffatt was running for Congress and his wife was running for State Senate).

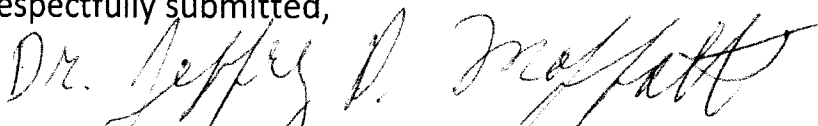
For all the foregoing reasons stated above, which have caused ongoing constitutionally irreparable prejudices, harms and shattering of his family leaving Moffatt no choice, but to file this Tort Claim.

Hoping to have amicable confidential resolution because ("Moffatt") has still taken pride with receiving his State Arizona Lawyer's License in 2002 from the Supreme Court of Arizona.

**It is long overdue for the State of Arizona to right its wrongs against Moffatt and his family due to Unconstitutionally Seated Judge State Supreme Court of Arizona William J. O'Neil, Presiding Disciplinary Judge, only mere (State Employee).**

I look forward to hearing back from YOU promptly.

Respectfully submitted,



*Dr. Jeffrey D. Moffatt*, (Retired Federal Attorney), BA, MBA, LL.M (Masters in Taxation Law) and Juris Doctorate

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