

at enormous and mostly wasteful cost to the taxpayers. Motivation for much of the alleged impropriety appears retaliatory, intended to do personal harm to the reputations of Judges, County Supervisors, and other county officials. Actions by Respondent appear intent on intimidation, focused on political gain, and appear fully disconnected from professional and prosecutorial standards long associated with the administration of justice, particularly criminal justice.

Among other things, actions attributed to Respondent by Bar Counsel include:

- Appearance in matters before the Superior Court of Arizona in the face of disqualifying conflicts of interest. ER 1.7.
- Acts intended to harass and place undue and unnecessary burdens on Judges, County Supervisors, and other county officers and employees. ER 4.4.
- Misrepresentation and distortion of factual information before the courts. ERs 3.3, 8.4(c).
- Acts motivated by personal animosity toward Judges and members of the County Board of Supervisors. ERs 1.7, 4.4, 8.4(d).
- Acts motivated by animosity toward outside counsel appointed in civil matters by the Board of Supervisors. ERs 1.6, 1.7, 4.4, 8.4(d).
- Abuse of federal process by filing and pursuing a racketeering (RICO) suit against Superior Court Judges, County Supervisors, and outside counsel without evidence sufficient to establish standing before the U.S. District Court, or to introduce a credible case. ERs. 3.1, 4.4, 8.4(d).
- Abuse of state process and grand jury practice by securing and serving criminal indictments against Judges, County Supervisors, and others, without adequate evidentiary support. ERs 3.8, 4.4, 8.4(d).
- Failure to submit substantive responses to Bar Counsel's inquiries following denials of all motions and special actions filed by counsel on behalf of Respondent. Rule 53(d) and (f)(1), Ariz.R.Sup.Ct.*

* Among the specific charges against Respondent, the undersigned Panelist has added violations of Rules 53(d) and (f)(1), Ariz.R.Sup.Ct., which are predicated on Respondent's failure or refusal to cooperate or respond substantively to Bar Counsel's requests.

As a result, the unsigned Probable Cause Panelist, having reviewed this matter, finds that probable cause exists to issue a formal Complaint against Respondent for violations of Rule 42, Ariz.R.Sup.Ct., including but not limited to ERs 1.1, 1.6(a), 1.7(a)(1), 1.7(a)(2), 1.8(h)(2), 3.1, 3.3(a), 3.4(c), 3.6(a), 3.8(a), 4.4(a), 8.4(b), 8.4(c), 8.4(d), and Rule 53(d) and (f).

Parties may not file motions for reconsideration of this order.

IT IS THEREFORE ORDERED that the State bar prepare and file a Complaint with the Disciplinary Clerk.

DATED this 6th day of December, 2010.



Charles E. Jones
Probable Cause Panelist

Original filed this 6th day of December, 2010, with
Lawyer Regulation Records Manager.

Copies mailed this 6th day of December, 2010, to:

John S. Gleason
State Bar of Arizona
Independent Bar Counsel
Colorado Supreme Court
Office of Attorney Regulation Counsel
1560 Broadway, Suite 1800
Denver, CO 80202

Andrew Thomas
Andrew Thomas Law Office
11811 N. Tatum Blvd. Suite 3031
Phoenix, AZ 85028-1621

by: Sandra Montoya

at enormous and mostly wasteful cost to the taxpayers. Motivation for much of the alleged impropriety appears retaliatory, intended to do personal harm to the reputations of Judges, County Supervisors, and other county officials. Actions by Respondent appear intent on intimidation, focused on political gain, and appear fully disconnected from professional and prosecutorial standards long associated with the administration of justice, particularly criminal justice.

Among other things, actions attributed to Respondent by Bar Counsel include:

- Appearance in matters before the Superior Court of Arizona in the face of disqualifying conflicts of interest. ER 1.7.
- Acts intended to harass and place undue and unnecessary burdens on Judges, County Supervisors, and other county officers and employees. ER 4.4.
- Misrepresentation and distortion of factual information before the courts. ERs 3.3, 8.4(c).
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- Abuse of federal process by filing and pursuing a racketeering (RICO) suit against Superior Court Judges, County Supervisors, and outside counsel without evidence sufficient to establish standing before the U.S. District Court, or to introduce a credible case. ERs. 3.1, 4.4, 8.4(d).
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- Failure to submit substantive responses to Bar Counsel's inquiries following denials of all motions and special actions filed by counsel on behalf of Respondent. Rule 53(d) and (f)(1), Ariz.R.Sup.Ct.*

* Among the specific charges against Respondent, the undersigned Panelist has added violations of Rules 53(d) and (f)(1), Ariz.R.Sup.Ct., which are predicated on Respondent's failure or refusal to cooperate or respond substantively to Bar Counsel's requests.

As a result, the unsigned Probable Cause Panelist, having reviewed this matter, finds that probable cause exists to issue a formal Complaint against Respondent for violations of Rule 42, Ariz.R.Sup.Ct., including but not limited to ERs 1.1, 1.7(a)(1), 1.7(a)(2), 1.8(h)(2), 3.1, 3.3(a), 3.4(c), 3.8(a), 4.4(a), 8.4(b), 8.4(c), 8.4(d), and Rule 53(d) and (f).

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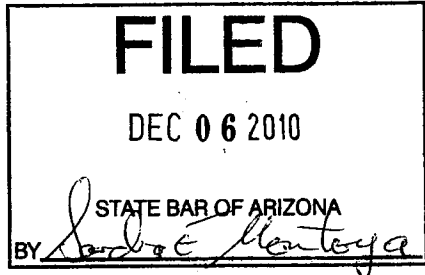
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Colorado Supreme Court
Office of Attorney Regulation Counsel
1560 Broadway, Suite 1800
Denver, CO 80202

Lisa Aubuchon
8400 S. Kyrene #123
Tempe, AZ 85284-2119

by: Sandra Montoya



**BEFORE THE PROBABLE CAUSE PANELIST
OF THE STATE BAR OF ARIZONA**

IN THE MATTER OF A MEMBER)	File Nos. 09-2294, 10-0664
OF THE STATE BAR OF ARIZONA,)	
)	
RACHEL ALEXANDER)	PROBABLE CAUSE ORDER
Bar No. 020092)	
)	
Respondent.)	
)	
)	

Pursuant to Administrative Order No. 2010-33 dated March 8, 2020, the Honorable Rebecca White Berch, Chief Justice, Supreme Court of Arizona, appointed the undersigned, Charles E. Jones, former Chief Justice of Arizona (now retired) to serve in these State Bar proceedings as Probable Cause Panelist. *See* Rule 46(f)(16), Ariz.R.Sup.Ct.

Respondent, Rachel Alexander, at all times relevant, was a deputy County Attorney in and for Maricopa County, Arizona, serving under Andrew Thomas.

As required by Rule 54(b)(4), Ariz.R.Sup.Ct., the Panelist has reviewed in its entirety Independent Bar Counsel John S. Gleason’s “Report of Investigation and Request for Authority to File Formal Complaint.” The Report was submitted by Mr. Gleason to the undersigned Panelist for Probable Cause Review.

Ethical violations by Respondent, as described by Independent Bar Counsel, are far-reaching and numerous. Motivation for much of the alleged impropriety appears retaliatory, intended to do personal harm to the reputations of Judges and other county

officials. Actions by Respondent appear intent on intimidation, focused on political gain, and appear fully disconnected from professional and prosecutorial standards long associated with the administration of justice, particularly criminal justice.

Among other things, actions attributed to Respondent by Bar Counsel include:


- Appearance in matters before the Superior Court of Arizona in the face of disqualifying conflicts of interest. ER 1.7.
- Acts intended to harass and place undue and unnecessary burdens on Judges, County Supervisors, and other county officers and employees. ER 4.4.
- Acts motivated by personal animosity toward Judges and members of the County Board of Supervisors. ERs 1.7, 4.4, 8.4(d).
- Abuse of federal process by pursuing a racketeering (RICO) suit against Superior Court Judges, County Supervisors, and outside counsel without evidence sufficient to establish standing before the U.S. District Court, or to introduce a credible case. ERs. 3.1, 4.4, 8.4(d).

As a result, the unsigned Probable Cause Panelist, having reviewed this matter, finds that probable cause exists to issue a formal Complaint against Respondent for violations of Rule 42, Ariz.R.Sup.Ct., including but not limited to ERs 1.1, 1.7(a)(1), 1.7(a)(2), 3.1, 3.4(c), 4.4(a), and 8.4(d).

Parties may not file motions for reconsideration of this order.

IT IS THEREFORE ORDERED that the State bar prepare and file a Complaint with the Disciplinary Clerk.

DATED this 6th day of December, 2010.


Charles E. Jones
Probable Cause Panelist

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