

1 **John H. Thaler**  
2 **In Pro Per**  
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8  
9 **Defendant, In Pro Per**

10 **STATE OF ARIZONA**  
11 **MARICOPA COUNTY SUPERIOR COURT**

12 **In the matter of**

13 **STATE OF ARIZONA**

14 Plaintiff

15 v.

16 **JOHN HARRIS THALER,**

17 Defendant.  
18

**Case No: CR2021-134056**

**DEFENDANT'S NOTICE OF MOTION  
AND MOTION TO CHANGE VENUE.**

**[Assigned to the Honorable Scott Minder]**

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21 **TO THE HONORABLE SCOTT MINDER AND TO ALEXANDER**  
22 **CHRISTIANTSON, MARICOPA COUNTY ATTORNEY:**

23 **NOTICE IS HEREBY GIVEN** that Defendant John Harris Thaler moves this  
24 Court for an Order changing venue of the above-entitled matter to Coconino County Superior  
25 Court, Flagstaff, Arizona.

26 Defendant brings this motion on the grounds that he a) cannot obtain a fair trial  
27 in Maricopa County, b) cannot obtain appointed counsel in Maricopa County, and c) faces  
28

1 extreme safety concerns if required to be in Maricopa County.

2 This Motion is based on this Notice of Motion, on the Memorandum of Points  
3 and Authorities included herewith, on the Appendices and Exhibits attached hereto, on the  
4 Court's file, and on any other evidence that may be produced at time of hearing.

5 Date: February 8, 2023

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JOHN HARRIS THALER, In Pro Per

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. STATEMENT OF RELEVANT FACTS**

3 A. Background

4 Defendant is an attorney who has been licensed to practice law in California since 1990.  
5 Defendant was an “in-house counsel” member of the Arizona State Bar from 2017 through 2019.  
6 Defendant’s firm, Harris/Thaler Law, specializes in investigating and litigating civil cases with issues  
7 focusing on traditional “white collar crimes” including racketeering and public corruption. Clients  
8 include private parties, private entities, and public entities. *(Attached hereto as Exhibit 1 and*  
9 *incorporated herein by reference is John H. Thaler’s Resume)*

10 Since February 2019, Defendant’s office has been conducting an investigation of racketeering  
11 and corruption in multiple states including Arizona. Within Arizona, the investigation has focused on  
12 Maricopa County and the cities of Mesa and Gilbert. Over 120,000 pages of documents have been  
13 reviewed to date. Defendant issued preliminary findings to Governor Doug Ducey in May 2022. The  
14 final report will be completed shortly and published. *Report to the Governor* will contain  
15 approximately 300 pages of narrative and approximately 3,000 pages of evidentiary documents.  
16 *(Attached hereto as Exhibit 2 and incorporated herein by reference is the front and back covers of*  
17 *the book entitled “Report to the Governor”)*

18 The summary of the *Report’s* findings is set forth in **Appendix A.**

19 A detailed description of the racketeering schemes is set forth in **Appendix B.**

20 These findings and the supporting evidence have rendered representation of Defendant in  
21 Maricopa County and adjudication of the charge in Maricopa County virtually impossible as conflicts  
22 of interest run, at a minimum, to the criminal defense bar, to the Maricopa County Attorney’s Office  
23 and to the Maricopa County Superior Court.

24 In simple terms, the Maricopa County database (and the City of Mesa and Town of Gilbert  
25 databases) has been compromised since it was designed in 2014. The new system was designed to  
26 allow outside access to upload falsified documents and to modify or remove legitimate documents. The  
27 infiltration includes filing false charges against those who are deemed threats to the racketeering  
28 enterprises and removing charges against participants. The database was also designed to allow

1 changes to be made to ballot counts. Maricopa County is likely facing a civil rights class action lawsuit  
2 by those wrongly charged and/or convicted.

3 With respect to Defendant, the within “charge” never should have been filed—assuming it ever  
4 was. The police report is riddled with false statements. It contains multiple full pages of redactions.  
5 *(Attached hereto as Exhibit 2 and incorporated herein by reference is Police Report associated with*  
6 *this case, case number # CR2021-134056)* No investigation was ever performed. Body cam and dash  
7 cam footage that would have contradicted the narrative apparently does not exist or was destroyed.  
8 Additionally, the purported signature of Frank P. Woods on the Direct Complaint has been falsified.  
9 *(Evidence withheld at this time)*

10 In or about March 2022, Defendant filed an action in the Federal District Court alleging civil  
11 rights violations against the City of Mesa, Town of Gilbert, Maricopa County, and various officials  
12 (Case No. 2:21-cv-02892-DSF-AS). **A true and correct copy of the First Amended Complaint is**  
13 **attached hereto as Appendix C.** The gravamen of the action concerns bribed officials attempting to  
14 disrupt Defendant’s investigation through numerous civil rights violations pursuant to 42 U.S.C. §1983.  
15 *(Attached hereto as Exhibit 3 and incorporated herein by reference is the List of Bribed Appointed*  
16 *and Elected Officials),*

17 Defendant also contends that the City of Mesa police department operates a specific unit  
18 intended to support the racketeering enterprises. The actions of officers in said unit include the  
19 following illegal and unwarranted activities: wire taps, phone taps, computer hacking, electronic  
20 vehicle surveillance, and unwarranted searches and seizures. In certain instances, officers in said unit  
21 have planted evidence to effect false arrests. *(Witness statements withheld at this time)*

22 In addition to damages, the First Amended Complaint seeks injunctive relief, including a  
23 preliminary and permanent injunction over the within proceedings.

24 At the time Defendant filed his First Amended Complaint, he had not been provided with the  
25 alleged police report and did not know that exculpatory/contradictory evidence somehow no longer  
26 exists. Defendant will be seeking leave to amend his action to include the additional rights violations.  
27 Through adjudication of the complaint, Defendant intends to secure federal consent decrees over the  
28 City of Mesa, Town of Gilbert, and Maricopa County, including its Office of County Recorder and the

1 Maricopa County Superior Court.

2 Further, as a result of these issues, the Maricopa County Attorney should expect a motion to  
3 disqualify its office from participating in any further prosecution and should also expect attorneys and  
4 staff to be interviewed and to be subpoenaed for trial as necessary.

5 More importantly, as set forth in detail *infra*, Defendant and his family face an extreme safety  
6 risk. Defendant's estranged spouse, Brittany Thaler, has been a key participant in the racketeering  
7 schemes along with her mother, Dawna Rae Chavez, and other Chavez family members in Arizona,  
8 California, New Mexico, Utah, and Illinois. Beginning in September 2019 and continuing to the  
9 present, Brittany has cooperated in a limited fashion with the investigation. Her actions have resulted  
10 in threats against her, Defendant, and their son, McKinley Harris Thaler.

11 Prior to September 2019, two known attempts were made on Defendant's life. In response to  
12 these attempts and threats against her and their son, McKinley, in November 2019, Brittany sought  
13 WITSEC protection but ceased pursuit of it in December 2019 when McKinley's life was threatened.  
14 Multiple threats of violence have been made against Brittany and have been made against McKinley.

15 To date, six attempts have been made on Defendant's life. *(Attached hereto as Exhibit 4 and*  
16 *incorporated herein by reference is the Declaration by Richard Salazar). (Attached hereto as Exhibit*  
17 *5 and incorporated herein by reference is the Declaration by Robert Bantleon) (Attached hereto as*  
18 *Exhibit 6 and incorporated herein by reference is a true and correct photograph the iced tea to-go*  
19 *cup containing illicit narcotic substances provided to Defendant without his knowledge on July 7,*  
20 *2019. This incident is discussed infra )*

21 Additionally, at least thirty-five (35) false reports ("swatting") have been made to multiple local  
22 law enforcement agencies intended to cause physical harm to Defendant. The within "charge" was  
23 intended to damage Defendant's license to practice law. *(Ref: Exhibit 3)*

24 Under no circumstances will Defendant put his life or the lives of his family at risk by traveling  
25 to Maricopa County. Defendant currently resides in a safe location.

26 For these reasons, this Court should Order the case removed from Maricopa County forthwith.  
27 Defendant suggests that the case be removed to Flagstaff/Coconino County.

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1 B. Documents Provided Herewith

2 Defendant provides certain marked exhibits and appendices. These are intended as samples of  
3 the plethora of documents reviewed to date. Within the appendices is the entirety of the formal reports  
4 issued to date by Linda L. Mitchell to date. **(Reference Appendix D)** Ms. Mitchell is a highly respected  
5 forensic questioned documents expert. Ms. Mitchell has reviewed more than 5,000 documents and has  
6 provided nearly 2,000 pages of written reports examining handwritings and the legitimacy of  
7 documents obtained by Defendant's office during its investigation. Ms. Mitchell's conclusions support  
8 the allegations made by Defendant in this Motion herein and the findings set forth in the Summary of  
9 Findings (*Appendix A*).

10 C. History

11 The following is a short summary and is not intended to provide all relevant information. In  
12 2009-2010, Arizona conducted an audit of its agencies regarding money laundering through them from  
13 Russian organized crime interests. Several individuals were indicted, charged and convicted. From  
14 2011-2012, Defendant's office was retained to investigate money laundering by a Russian organized  
15 crime group primarily operating out of Los Angeles with monies transferred through purchases and  
16 sales of single-family residences in California, Arizona, Montana, South Carolina and Florida, mostly  
17 in new home construction Areas of concern in Arizona included San Tan Valley, Litchfield Park, Good  
18 Year, and Avondale.

19 In an apparent effort to disrupt Defendant's investigation, on May 31, 2012, a falsified default  
20 judgment for approximately \$5,000 was entered against Defendant in Los Angeles County Superior  
21 Court (Case Number 11E11652). ***(Attached hereto as Exhibit 8 and incorporated herein by reference***  
22 ***is the CA Default Judgement with the fake signature by Judge Leland Harris – page 108)*** The alleged  
23 Plaintiff's attorney, "Paul Tokeshi," does not exist. The alleged signature of Judge Leland Harris on  
24 the "Judgment" is phony. Judge Harris has confirmed the same. Also, the "Judgment" on its face is  
25 improper and therefore void. Defendant did not become aware of this "Judgment" until June 2015.

26 In or about May 2014, Defendant's office was retained to investigate certain money laundering  
27 activities in Maricopa County. In 2006, the U.S. Department of Justice in Des Moines, Iowa charged  
28 multiple individuals, including drug suppliers and real estate agents with money laundering. One of

1 the agents charged was Patrick J. Murphy. In or about 2008, Murphy pled guilty to multiple counts of  
2 Structuring. At that time, the U.S. Attorney’s office did not know that Murphy’s structuring was used  
3 to move money from Des Moines, Iowa to Maricopa County for the purchase/sale of single-family  
4 residences or that upon sale, the proceeds were being transferred to a Panama-based corporation.  
5 *(Attached hereto as Exhibit 9A, 9B, 9C, 9D and incorporated herein by reference are the documents*  
6 *evidencing that Patrick Murphy was indicted and charged and that Beth Krantz, his putative spouse,*  
7 *was Murphy’s partner)*

8 Murphy died under questionable circumstances in Scottsdale, Arizona in September 2012. His  
9 putative spouse, Beth Krantz, also a real estate agent, was believed to be involved in the property  
10 purchases/sales and in the transfer of funds in and out of the Panama corporation.

11 Shortly after this investigation began, an application was made to enter the phony California  
12 judgment in Maricopa County as a foreign state judgment. Said judgment was entered under Case No.  
13 CV2001-01255 in September 2014—just as the investigation was concluding. . *(Attached hereto as*  
14 *Exhibit 10 and incorporated herein by reference are the transfer of the Foreign State Judgement*  
15 *from CA to AZ) (Attached hereto as Exhibit 11 and incorporated herein by reference is the AZ*  
16 *Default Judgement).* The investigation found a) evidence of Murphy’s involvement in laundering cash  
17 through property purchases in Arizona; b) evidence of the transfer of proceeds to a Panama corporation;  
18 and b) after Murphy’s death, cash continued to be laundered in the same manner through properties  
19 allegedly purchased using Murphy’s name.

20 Defendant met and began dating Brittany Rae Chavez (“Brittany”) in October 2014. On April  
21 13, 2016, the couple married. At the time of the marriage, Defendant did not know that Brittany and  
22 her mother, Dawna Rae Chavez (“Dawna”) were “cleaners” –a slang term for money launderers. The  
23 Chavez family laundered/launders money primarily for the Sinaloan Cartel. Said cartel uses resources  
24 under the control of the Arizona based Church of Jesus Christ of Latter-day Saints—accounts generally  
25 protected from audit due to non-profit status. The laundered monies come from narcotics trafficking  
26 and from human trafficking. Most of the money is laundered through purchases of single-family  
27 residences.

28 The phony California action, including the application for judgment and judgment were

1 prepared by Brittany. (*Ref: Exhibits 8,10,11*) The handwriting and hand printing on the documents has  
2 been identified as belonging to Brittany. (*Ref: Exhibit 7A page 139*) A significant portion of the  
3 handwriting and hand printing on the foreign state judgment application documents has been identified  
4 as belonging to Brittany. Brittany meeting Defendant was not an accident. Brittany was paid to  
5 befriend Defendant and then infiltrate Defendant's office and office computer system to determine  
6 whether Krantz had provided Defendant with evidence of the money laundering.

7 Dawna's crime career started in 1986 in Cook County, Illinois, with phony trust deeds bearing  
8 her handwriting. (*Attached hereto as Exhibit 12 and incorporated herein by reference are Trust*  
9 *Deeds bearing Dawna's Handwriting from 1986*) Brittany's career started in 1995 at eight years old  
10 by filling out (by hand) trust deeds and related recorded documents used to facilitate these schemes.  
11 (*Attached hereto as Exhibit 13 and incorporated herein by reference are Deeds signed by Brittany*  
12 *in 1995 as Buyer and/or Seller and/or Notary*) Hundreds of trust deeds and warranty deeds recovered  
13 from Cook County, Illinois, Lake County, Indiana, and Polk County, Iowa connected with Murphy and  
14 other real estate agents have Brittany and Dawna's handwriting and hand printing on them. (*Attached*  
15 *hereto as Exhibit 14 and incorporated herein as reference are a multitude of Deeds and other*  
16 *Documents from multiple states signed by Brittany and/or Dawna as Buyer and/or Seller and/or*  
17 *Notary*) The scheme continues as said phony deed documents run through 2022. (*Attached hereto as*  
18 *Exhibit 15 and incorporated herein by reference are Deeds signed by Brittany through 2022 as Buyer*  
19 *and/or Seller and/or Notary*) Defendant is currently working with the U.S. Attorney's Office.

20 The laundering operation moved to Arizona in or about 1994. Since that time, more than 10,000  
21 (and as many as 25,000) fraudulent transactions have been recorded in Maricopa County. At least  
22 5,000 recorded documents evidence either the buyer/seller signatures and/or notary signatures  
23 belonging to Brittany or Dawna. (*Ref: Exhibit 12, 13,14,15*)

#### 24 D. Bribery of Public Officials

25 With respect to bribery, Brittany and Dawna facilitate payment to elected and appointed state,  
26 county and local officials through phony mortgages where the "mortgage" (either through a refinance  
27 or on a new purchase) is the bribe. In some instances, the bribes are paid through contributions to  
28 political action committees (as set forth in I.R.C. §527). (*Attached hereto as Exhibit 16 and*



1 *incorporated herein by reference are the formation documents for the Political Action Committee*  
2 *set up by Katie Hobbs filled out with Brittany's handwriting)*

3 And in other instances, bribes are paid through phony auto accident treatment claims—  
4 AHCCCS liens. *(Attached hereto as Exhibit 17 and incorporated herein by reference are AHCCCS*  
5 *Liens for Public Officials used as bribes)*

6 In Arizona, public officials accepting bribes include members of the legislative and executive  
7 branches of the state government, more than two dozen judges of the Maricopa County Superior Court,  
8 at least two judges of the City of Mesa Court, at least one judge of the Town of Gilbert Court, the  
9 Mayor of Mesa, five members of the Mesa City Council, several police officers employed by the City  
10 of Mesa, several officers employed by the Town of Gilbert, the Mesa City Prosecutor and at least one  
11 assistant prosecutor, election officials employed by the Maricopa County Recorder's Office, three  
12 Maricopa County supervisors, and principals of Runbeck Election Services, to name a few. Bribe  
13 recipients also include support staff members including judicial assistants and clerks. For convenience,  
14 a partial list of officials who have accepted bribes is set forth in **Appendix D.** *(Attached hereto as*  
15 *Exhibit 7B and incorporated herein by reference are QDE Reports pertaining to Elected and Non-*  
16 *Elected Officials by Linda Mitchell)*

17 E. Defendant's Discovery of the Racketeering

18 Brittany and Defendant have one child together, McKinley Harris Thaler. *(Attached hereto as*  
19 *Exhibit 18 and incorporated herein by reference are photos of Defendant and his son, McKinley)*  
20 McKinley was born on December 12, 2017. In late February 2018, Defendant and Brittany decided to  
21 create a trust for McKinley's benefit. To that end, Defendant researched the recorded documents on  
22 their residence. During his research, Defendant found multiple deeds containing the name "Brittany  
23 R. Chavez" where the signature matched the handwriting of his wife. That match has been confirmed  
24 by the forensic QDE. *(Reference Exhibit 7A)* Further, the deeds evidenced Brittany as married to a  
25 "Justin Chavez." Deeds and marriage certificates subsequently discovered evidence Brittany as being  
26 married to at least a dozen individuals with the marriages occurring from before her marriage to  
27 Defendant, during her marriage to Defendant and continuing to this day. *(Attached hereto as Exhibit*  
28 *16 and incorporated herein by reference are the supportive documents to accompany Appendix E)*

1 A list of the apparent husbands and the supporting documentation is attached hereto as  
2 **Appendix E.** Thus, the marriage to Brittany was a sham.

3 During the remainder of 2018, Defendant discovered more than 100 fake trust deeds and  
4 warranty deeds in Maricopa County wherein either Brittany or Dawna executed the document as  
5 “buyer” or “seller” and/or notarized the document under an assumed name. At least half the documents  
6 purported to be executed by “married” parties.” *(Attached hereto as Exhibit 17 and incorporated*  
7 *herein by reference are Fake Deeds with the last name “Chavez”)*

8 The discovery of the falsified deeds led to the discovery of additional racketeering enterprises  
9 including, but not limited to: insurance fraud, payroll fraud, and bankruptcy fraud. *(Attached hereto as*  
10 *Exhibit 17 and incorporated herein by reference are Fake Deeds with the last name “Chavez”)*  
11 *(Attached hereto as Exhibit 18 and incorporated herein by reference are Fake AHCCCS Liens as*  
12 *proof of Insurance Fraud) (Attached hereto as Exhibit 19 and incorporated herein by reference are*  
13 *Fake Arizona Bankruptcy Filings all under the name “BRITTANY”)* *(Attached hereto as Exhibit*  
14 *21 and incorporated herein by reference are Fake Payroll Documents and Insurance Fraud*  
15 *Examples)*

16 It also led to the discovery of the extortion schemes where falsified default judgments, criminal  
17 restitution judgments, and child support orders are used to extort monies from individuals. *(Attached*  
18 *hereto as Exhibit 20 and incorporated herein by reference are Fake Default Judgements signed by*  
19 *Brittany and/or Dawna) (Attached hereto as Exhibit 22 and incorporated herein by reference are*  
20 *Examples of Fake Child Support Orders and Restitution Judgements signed by Brittany and/or*  
21 *Dawna)*

## 22 F. Federal Litigation

23 The relevant events from 2019 through March 2022 are set forth in greater detail in Defendant’s  
24 First Amended Complaint filed in Federal District Court, bearing Case No. **2:21-cv-02892-DSF-AS.** *(Ref:*  
25 *Appendix C).*

26 In summary, the facts include:

- 27 a. In February 2019, Defendant’s office is retained to investigate a multi-state money laundering  
28 operation related to cash earned from the sale of illicit narcotics.

- 1 b. On April 21, 2019, an attempt is made on Defendant's life by tampering with the right front tire  
2 on his rental vehicle; ***(Ref: Exhibit 5)***
- 3 c. On July 7, 2019, a second attempt is made on Defendant's life by poisoning a beverage provided  
4 to him; ***(Attached hereto as Exhibit 6 and incorporated herein by reference is the container***  
5 ***that has been preserved as forensic evidence of poisonous iced tea)***
- 6 d. In September 2019, Brittany becomes a cooperative witness. She provides a plethora of evidence  
7 concerning the racketeering schemes including a portable hard drive containing spreadsheets  
8 evidencing the distribution of the cash from the laundering operations and from the bribes.
- 9 e. On November 17, 2019, Brittany requests that Defendant and his colleague, John J. Stanley, seek  
10 WITSEC protection for her.
- 11 f. On December 12, 2019, the occasion of McKinley's second birthday, Brittany is coerced into taking  
12 McKinley while Dawna falsified a Superior Court Order of Protection in favor of Brittany. By these  
13 actions, City of Mesa participants intend for Defendant to violate the phony order thereafter arresting him.  
14 The plan fails; ***(Attached hereto as Exhibit 20 and incorporated herein by reference is the Fake Order***  
15 ***of Protection against John Thaler on December 12, 2019) (Ref: Exhibit 7A)***
- 16 g. On December 13, 2019, a falsified petition for dissolution is uploaded into the Superior Court  
17 database. Ex parte applications are filed to prevent the return of McKinley to Defendant. The  
18 applications were denied by Judge Otis; ***(Attached hereto as Exhibit 21 and incorporated***  
19 ***herein by reference is the Fake Order of Protection secured by Brittany against John Thaler***  
20 ***on December 12, 2019) (Ref: Exhibit 7A)***
- 21 h. On December 29, 2019, Defendant and Brittany meet secretly to discuss WITSEC and the  
22 evidence she has provided Defendant to date;
- 23 i. On the night of December 29, 2019, Defendant enters Banner Gateway hospital suffering from a  
24 blood pressure spike resulting from the July 2019 poisoning. ***(Attached hereto as Exhibit 26 and***  
25 ***incorporated herein by reference are the Banner Heart Hospital Records for John Thaler in***  
26 ***December 2019)***
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- 1 j. On December 30, 2019, Brittany and McKinley come to Banner Gateway to visit Defendant.  
2 Shortly thereafter, Dawna and the City of Mesa participants order Brittany to stay away from  
3 Defendant;
- 4 k. On December 31, 2019, Defendant is transferred to Banner Heart Hospital where an angiogram  
5 is performed. *(Attached hereto as Exhibit 38 and Exhibit 39 and incorporated herein by*  
6 *reference are the Banner Gateway and Banner Heart Hospital Records for John Thaler in*  
7 *December 2019)*
- 8 l. Simultaneously, Detective Brian Bullock files a report seeking to have the Town of Gilbert file a  
9 criminal charge against Defendant for having contact with Brittany in violation of the falsified  
10 Order of Protection—at the same time as he was receiving the angiogram. Despite having no  
11 subject matter jurisdiction to file a criminal charge, the Town of Gilbert did so anyway in July  
12 2020; *(Attached hereto as Exhibit 22 and incorporated herein by reference are Deeds*  
13 *belonging to Brian Bullock with hand writing and signing of Brittany and/or Dawna)*
- 14 m. In or about January 2020, Judge Otis resigns from the bench after e-mail conversations were  
15 leaked between her and her clerk regarding comments she made about parties in her courtroom;
- 16 n. In February 2020, Commissioner (now Judge) Andrew Russell is appointed to adjudicate the  
17 family law case (Case Number: FC2019-0980211);
- 18 o. On February 20, 2020, Commissioner Russell orders 50/50 custody and ordered Dawna to  
19 facilitate the custody exchanges; *(Attached hereto as Exhibit 24 and incorporated herein by*  
20 *reference is the 50/50 custody Order by Commissioner Russell)*
- 21 p. Several weeks later, Brittany and her attorney, Erica Gadberry, falsify an Order to sell the family  
22 residence. Thereafter, they withhold the sale documents evidencing a higher purchase price  
23 than that which was reported. Upon completion of the sale, they fail and refuse to account for  
24 the net proceeds and fail to provide Defendant his share of said proceeds. *(Attached hereto as*  
25 *Exhibit 25 and incorporated herein by reference is the Fake Stipulation to Sale of the Marital*  
26 *Residence)*
- 27 q. During the time of the house sale in March 2020, Commissioner Russell is removed from the  
28 Department and from the case;

- 1 **r.** On April 4, 2020, McKinley is abducted in violation of the Custody Order as a second attempt to  
2 bait Defendant into violating the phony Order of Protection. When that plan fails, McKinley is  
3 returned to Defendant on April 18, 2020; ***(Attached hereto as Exhibit 26A and 26B and***  
4 ***incorporated herein by reference is the Motion submitted to the Superior Court by John***  
5 ***Thaler requesting that Brittany Thaler abide by the custody order – April 18, 2020);***
- 6 **s.** In mid -April 2020, Judge Marvin L. Davis and J.A. Madison Hughes are assigned to the  
7 dissolution. Ms. Hughes, who holds no qualifications for the job, is a bribe recipient who was  
8 previously employed within one of the racketeering entities operated by Dawna Chavez.  
9 ***(Attached hereto as Exhibit 26 and incorporated herein by reference is Proof that Madison***  
10 ***Hughes is Bribed and not qualified for the job)*** From this point to the present, not a single  
11 pleading filed by Defendant is seen or read by Judge Davis. ***(Attached hereto as Exhibit 27A***  
12 ***and 27B and incorporated herein by reference is a list of all motions, briefs etc. submitted to***  
13 ***the Court under the case number: FC2019-098211)***
- 14 **t.** In late April 2020, Dawna prepares a phony City of Mesa Order of Protection against Defendant  
15 in favor of herself, despite being the court appointed facilitator of custody exchanges—of which  
16 Mesa lacks subject matter jurisdiction to issue; ***(Attached hereto as Exhibit 28 and incorporated***  
17 ***herein by reference is the fake Order of Protection secured by Dawna Chavez against John***  
18 ***Thaler)***
- 19 **u.** On September 19, 2020, McKinley is abducted for a third time and kept at Dawna’s residence.  
20 To this date, Defendant has not seen or heard from his child. Attempts by Defendant’s family  
21 members and friends to see or speak to McKinley are ignored; ***(Attached hereto as Exhibit 29***  
22 ***and incorporated herein by reference is the Defendant's (John Thaler) Petition to enforce***  
23 ***parenting time September 23 2020)*** ***(Attached hereto as Exhibit 30 and incorporated herein by***  
24 ***reference is the Defendant's (John Thaler) Emergency Motion for an order to retrieve his son***  
25 ***from petitioner who refuses to comply with the courts temporary custody orders)***
- 26 **v.** Racketeering participants in the City of Mesa, including the City Prosecutor, Paul Hawkins, then  
27 prepare two dozen charges of violating Dawna’s phony Order of Protection. The alleged  
28 violations include communications between Dawna and him that concern the exchanges with

1 McKinley—per the February 20, 2020, Superior Court Order. Said charges are unlawful as  
2 subject matter jurisdiction belongs exclusively to the Family court. Said charging documents are  
3 then mailed to an incorrect address to ensure Defendant does not see them and that warrants will  
4 issue; ***(Ref: Exhibit 7A)***

5 w. On January 8, 2021, a phony dissolution decree is uploaded into the court database containing  
6 falsified signatures of Judge Davis. ***(Ref: Exhibit 7A page 003)*** Defendant immediately files a  
7 motion to set aside and vacate the judgment. In July 2021, a falsified Order denying the motion  
8 is uploaded into the database. ***(Attached hereto as Exhibit 31 and incorporated herein by  
9 reference is the phony Divorce Decree entered on January 8, 2021 (Attached hereto as Exhibit  
10 32 and incorporated herein by reference is the Respondent's Notice of Motion and Motion for  
11 this court to dismiss the Petitioner's Application for Dissolution of Marriage) (Ref: Exhibit 7A  
12 page 0003)***

13 x. In March 2021, Defendant hires forensic Questioned Documents Expert Linda L. Mitchell to  
14 examine falsified recorded documents and falsified court pleadings including falsified Orders  
15 allegedly issued by Judge Davis. Ms. Mitchell issues a report to the Clark County Superior  
16 Court (Las Vegas, Nevada) stating that the dissolution of marriage pleadings in FC2019-098211  
17 are falsified and that the Orders allegedly issued by Judge Davis are falsified (the signature  
18 handwritings belong to Dawna Rae Chavez). ***(Ref: Exhibit 7A page 0003)***

19 y. On May 9, 2021, Defendant and Brittany arrange for Defendant to spend a couple of hours with  
20 McKinley at a family custody facility in Chandler. All arrangements are made through the  
21 facility's representatives. ***(Attached hereto as Exhibit 33 and incorporated herein by reference  
22 is the communications between Jacqueline S Breger and Andrea Chavez – Director of  
23 Supervised Visits at AZ for Children Supervised Visitation)*** Dawna and Mesa participants  
24 discover the arrangement. Mesa participants threaten Brittany with bodily harm if she brings  
25 McKinley to the facility. They then send a third party to be present to threaten Defendant and to  
26 cause him bodily harm. To prevent the harm, Dawna, pretending to be Brittany, phones in a  
27 false police report to the Chandler police claiming that Defendant has been threatening “her”  
28

1 (Brittany). Defendant is refunded his money and leaves the premises. Apparently, the Chandler  
2 police officers arrive thereafter.

3 z. The police report is heavily redacted. The redacted information materially contradicts other  
4 information in the report such that no violation of law occurred and no charge should have been  
5 filed. Body cam and dashboard cam, which contradicts the police report is destroyed. (*Attached*  
6 *hereto as Exhibit 2 and incorporated herein by reference is the Police Report – redacted*)

7 aa. In or about August 2021, a charge of “evading the police” is filed against Defendant and mailed  
8 to an incorrect address. Case #CR2021-134056

9 G. Case No. FC2019-098211

10 The falsified Petition for Dissolution of Marriage dated December 13, 2019, bears Case No.  
11 FC2019-098211. (*Ref: Exhibit 7C*) (*Attached hereto as Exhibit 29 and incorporated herein by*  
12 *reference is the fake Divorce Decree with the forged signature of Judge Marvin Davis*) The first  
13 judge on the case, Judge Otis, denied several motions made by “Petitioner.” The second judge on the  
14 case, Commissioner Russell, ordered joint custody after the February 20, 2020, hearing. (*Ref: Exhibit*  
15 *24*) Then came Judge Marvin L. Davis and his bribed J.A., Madison Hughes (*Ref: Exhibit 26*). That  
16 was not an accident.

17 Not a single filing made by Defendant was ever seen or read. Ms. Hughes made sure of that.  
18 The unseen pleadings include motions and Oppositions to motion. (*A chart evidencing this debacle is*  
19 *attached hereto as Exhibit 27A and 27B and incorporated herein by reference.*) “Orders” allegedly  
20 issued by Judge Davis have forged signatures belonging to Dawna Chavez. The signatures on the  
21 Decree are forgeries. (*Attached hereto as Exhibit 29 and incorporated herein by reference is the fake*  
22 *Divorce Decree with the forged signature of Judge Marvin Davis*) (*Ref: Exhibit 7A Page 3*)  
23 The signature on a Notice of Acknowledgment of Receipt is a forgery. (*Attached hereto as Exhibit 35*  
24 *and incorporated herein by reference is the Notice of Acknowledgement of Receipt with the forged*  
25 *signature of Judge Marvin Davis*) The falsifying of Orders runs through July 2022.

26 Defendant will be filing a Petition for Special Action shortly to set aside and vacate the Decree  
27 and all Orders issued under Judge Davis since he was assigned the case in April 2020.

28 //

1 H. Election Fraud Investigation

2 The parameters of Defendant's investigation originally did not include election fraud. That  
3 changed in October 2020 when Defendant was provided certain information concerning the county  
4 computer database and the identities of bribe recipients, and when, in October 2020, Defendant's team  
5 discovered approximately 100,000 falsified ballots being carried from Mesa to certain offices in  
6 Phoenix, Arizona.

7 Over the past fifteen years, Brittany has used her access to load falsified default judgments into  
8 the Superior Court's database. *(Attached hereto as Exhibit 20 and incorporated herein by reference*  
9 *are Fake Default Judgements created by Brittany or Dawna or both)* Like the falsified judgment in  
10 Los Angeles County, the fake judgments in Arizona are used to financially damage those that are  
11 deemed detrimental to the racketeering enterprises. Since at least 2004 and running through the  
12 November 2022 election, Brittany and Dawna have been facilitating illegal transfers of funds to  
13 political candidates and campaigns. *(Attached hereto as Exhibit 45A and 45B and incorporated herein*  
14 *by reference is proof of bribes being paid towards Political Action Campaign)* Some of the money  
15 travels through the phony mortgage scheme; some of the money travels to limited liability companies,  
16 including political action committees. *(Attached hereto as Exhibit 36A and 36B and incorporated*  
17 *herein by reference are LLC's set up to launder money and facilitate bribes through single family*  
18 *residences)* The investigation into election fraud is not limited to the State of Arizona. However, where  
19 it is concerned, a plethora of individuals are implicated in the fraud including elected and appointed  
20 officials and Runbeck Election Services, the service provider for Maricopa County. *(Appendix D)* The  
21 Maricopa County database has no integrity whatsoever. Since at least 2004, ballot counts have been  
22 tampered with. The county's current computer database, which was built between 2014-2015, is  
23 infiltrated and hacked. Its architects specifically designed the system with multiple backdoor entry  
24 points. These points permit the uploading of falsified documents and the removal of genuine  
25 documents from the county court system and from the Recorder's office. Brittany has access to at least  
26 one back door.

27 Beginning in 2017, the access points have been used to change vote totals and thereon, election  
28 results. Candidates/Office holders who have accepted illegal payments facilitated by Brittany are



1 included on *Appendix D*. Illegal transfers of funds have also been provided to Robert Runbeck  
2 (principal of Runbeck Election Services) and Jeff Ellison (COO, Runbeck Election Services). The  
3 phony deeds used in the scheme to move money to candidates are created by Brittany. For-profit and  
4 non-profit PACs are also created by Brittany and used to move money to candidates. *(Attached hereto*  
5 *as Exhibit 37 and incorporated herein by reference are AHCCCS Liens used to pay Bribes to Public*  
6 *Officials) (Attached hereto as Exhibit 38 and incorporated herein by reference are Deeds used to*  
7 *pay Bribes to Public Officials)*

8 During the 2022 election, ballot scanners/printers at 70 precincts suffered changes to their  
9 printer settings despite being tested the night before the election. The changes in settings were made  
10 through computer infiltration, not manually. *(Attached hereto as Exhibit 38 and incorporated herein*  
11 *by is the letter written to the Arizona Attorney General's Office by Mr. Thaler)*

12 The uncountable ballots were placed in "Box 3's" and allegedly driven to Runbeck for  
13 counting.

14 Witness information provided in October 2020 confirms that more than 100,000 filled in ballots  
15 and more than \$6 million were identified by Defendant's investigators in three unmarked rental vans.  
16 Those vans were loaded with the ballots and cash at a private residence in Mesa, Arizona and then  
17 driven to the Runbeck office in downtown Phoenix. (Witness statements withheld.)

18 The Runbeck company is operated by Robert Runbeck. Recorded documents obtained by  
19 Defendant evidence bribes paid to Runbeck through the phony mortgage scheme. *(Ref: Exhibit 38)*  
20 Jeffrey Ellison is in charge of operations at Runbeck. Recorded documents obtained by Defendant  
21 evidence bribes paid through the phony mortgage scheme to him. *(Ref: Exhibit 38)*

22 Mr. Ellison is also the Chief Operating Officer of Precision Aero, an Arizona based aerospace  
23 company. Precision Aero's majority owner is Black Mountain Investment Company. (cite) Black  
24 Mountain's primary business is property investment. Recorded documents obtained for Black  
25 Mountain evidence money laundering through property purchases and sales. *(Attached hereto as*  
26 *Exhibit 40 and incorporated herein by is proof of Deeds for Black Mountain with Brittany and/or*  
27 *Dawna's writing)*

28 The principal of Precision Aero and Black Mountain is Mahai Toma. These companies are

1 operated with his brother, Andrei. (**Ref: Exhibit 38**) Black Mountain is also operated by George Bottea  
2 III, a licensed attorney. All three individuals have recorded documents evidencing bribes paid through  
3 the phony mortgage scheme. The documents also evidence money laundering. Mihai and Andrei's  
4 brother is Ben. Ben Toma is the Speaker of the Arizona House of Representatives. Representative  
5 Toma is just one of many state legislators with documents evidencing the acceptance of bribes through  
6 the phony mortgage scheme.

7 With respect to the November 2020 election, an example of an impossible outcome includes  
8 Adrian Fontes' loss to Stephen Richer for Maricopa County Recorder. Richer's win is a statistical  
9 impossibility. To wit: Fontes is a Democrat and was the incumbent; Percentages for Biden, Sinema  
10 and Kelly run at approximately 2.5% margins in the county against their opponents. Richer won by  
11 approximately 6,000 votes. That means 50,000 individuals who voted for the Democrat ticket across  
12 the board had to choose the Republican candidate for recorder against an incumbent who never suffered  
13 a scandal.

14 Never happened. This was a "planned" loss. Hobbs would receive the Democrat nomination  
15 for Governor and Fontes would run for Secretary of State to replace Hobbs. Hobbs and Fontes have  
16 "Brittany" deeds evidencing participation in the bribes. (**Ref: Exhibit 38**)

17 As stated above, the fix for 2020 (and for 2022) started in 2017 with appointments to election  
18 position of individuals taking bribes through the mortgage system (**Ref: Exhibit 38**) and monies being  
19 laundered through the appointment of phantom "individuals." (**Ref: Exhibit 38**). The problems with  
20 these documents are many.

21 For example, as to the appointments notarized by "Jessica York:" First, the handwriting and  
22 hand printing of "Jessica York" have been identified as belonging to Brittany. (**Attached hereto as**  
23 **Exhibit 41 and incorporated herein by is proof of Jessica York as a fake Notary**)

24 Second, the York signatures are the same handwriting but not the same style. And that change  
25 of style exists even where the documents are allegedly signed on the same day—June 4, 2020. These  
26 issues. Third, the "December 9" date for the clerk is a handwriting matching Dawna. Fourth, the  
27 signature of the clerk at the bottom right is actually a tracing of a signature stamp intended to look like  
28 a live signature. Fifth, the time between the signature and notarization and the alleged execution by

1 the clerk and thereafter the recording date evidence forgery. The normal turnaround time is 2-3  
2 weeks. All took multiple months, and all were allegedly clerk executed and recorded AFTER the  
3 election certification.

4 Another example: Celia Nabor is the Assistant Elections Director for Maricopa County. She  
5 supervises mail-in ballots. Her “appointment dated “February 6, 2020” has a forged notarization, a  
6 forged clerk date (handwriting) and with traced signature, and a forged signature for Ms. Nabor. (cite)  
7 And it was not recorded until more than ten months after it was allegedly signed. The notary hand  
8 printing and signature forgeries are Brittany’s handwriting. Moreover, the signature of Ms. Nabor is  
9 a forgery. (cite)

10 Approximately 10 days ago, Ms. Nabor was subpoenaed to testify regarding election fraud and  
11 specifically about a plethora of fraudulent activities concerning signature verifications on mail-in  
12 ballots. Ms. Nabor never showed. She has not been seen for nearly week and is considered “missing.”  
13 And apparently, Ms. Nabor has been removed from the county payroll system.

14 Another example: the “October 10, 2018” appointment of Michael Hornbeck. (*Attached hereto*  
15 *as Exhibit 42 and incorporated herein by is proof of Hornbeck Fake Oath*) The document was signed  
16 and notarized four months AFTER allegedly being signed and stamp-signed by the clerk. The  
17 notarization hand printing and signature are a match for Brittany.

18 Another example: the appointment docs and deeds of "Colleen Connor" aka "Mary Colleen  
19 Connor." The handwriting on the appointment document oath does not match the previous oath in 2005  
20 or the deeds of 2019 and 2022. Also, the 2005 Oath has Brittany's handwriting as the "notary."  
21 (*Attached hereto as Exhibit 43 and incorporated herein by is proof of Connor Fake Oath*)

22 In addition to state representatives, three of the five Maricopa County Supervisors also have  
23 recorded documents evidencing the acceptance of bribe payments (*Ref: Exhibit 38*) Additionally, the  
24 falsified signature for Thomas Galvin on his oath of office matches the handwriting for phantom  
25 attorney Paul Tokeshi and phantom D.A.M.E.S. Charities founder “Michele Thorne”—all of which  
26 have been identified as handwriting belonging to Brittany. (*Attached hereto as Exhibit 43 and*  
27 *incorporated herein by is proof Tokeshi, Michele Thorne and Galvin Signatures Match*) (*Ref:*  
28 *Exhibit 7A Page 140*)

1 Further, Defendant and his team have investigated PACs related to state office holders and “dark  
2 money” transactions related to said PACs. From late 2018 through 2022, a significant number of  
3 questionable real estate transactions were facilitated by several law firms including partners at Perkins  
4 Coie.

5 H. Status of Investigations

6 Defendant’s investigation covers multiple states. At this time, the money laundering activities  
7 affect 20 states. The bankruptcy fraud affects 11 states. And so on. As to Arizona, Defendant and his  
8 team have interviewed over thirty witnesses in Arizona. Several individuals on the Public Officials list  
9 have cooperated with the investigation. The team has collected and reviewed more than 120,000 pages  
10 of documents including recorded deeds, bank statements, court filings, and GPS locator records just in  
11 the State of Arizona. Additionally, Defendant and his team have reviewed more than 8,000 pages of  
12 cell phone and text records belonging to principal players in the racketeering enterprises. Since July  
13 2021, Defendant has met with attorneys general in five states, with FBI agents, with the U.S.  
14 Bankruptcy Trustee, with the U.S. Attorney’s Office in several states. Currently, there are multiple  
15 active and ongoing investigations in federal and state jurisdictions. California has already taken certain  
16 actions that include the removal of “Paul Tokeshi” from its list of active attorneys. (*Attached hereto as*  
17 *Exhibit 46 and incorporated herein by reference is the CA State Bar reference.*)

18 **II. DEFENDANT CANNOT OBTAIN REPRESENTATION**  
19 **OR RECEIVE A FAIR TRIAL IN MARICOPA COUNTY**

20 On proper notice, any party may move for a change in venue. Grounds which may be alleged  
21 include:

22 That there exists in the county where the action is pending so great a prejudice against the  
23 party requesting a change of venue that he cannot obtain a fair and impartial trial; 2. That the  
24 convenience of witnesses and the ends of justice would be promoted by the change; 3. That  
25 there is other good and sufficient cause, to be determined by the court. *See* A.R.S. §12-406(b).

26 In the instant matter, multiple causes for venue change exist. First is infiltration of the Maricopa  
27 County databases including the court’s database. Defendant has already suffered immeasurable  
28 damage from the proceedings in FC2019-098211 where falsified court orders were issued and where

1 his pleadings were virtually erased. It has contributed to the now 28-month separation between  
2 Defendant and his son, McKinley and to irreparable harm to McKinley.

3 Second, is bias and prejudice in Maricopa County. Defendant's investigation implicates many  
4 Maricopa County officials including judges of the Maricopa County Superior Court (or their  
5 elected/appointed spouses), members of the Attorney's Office, and members of the Attorney General's  
6 Office in bribery and racketeering. Defendant contends that incident of May 9, 2021 amounts to a  
7 "swatting" attempt and that the "Police Report" concerning the alleged incident contains a plethora of  
8 false statements. Further, Defendant contends that exculpatory evidence was destroyed intentionally.

9 Third is conflict of interest. Here, the conflicts run to public defenders and private attorneys  
10 who know parties implicated in the racketeering and bribery schemes. As the Court has been told, the  
11 reality is this: there are no attorneys in Maricopa County without a relationship with one or more  
12 officials implicated in the racketeering and bribery schemes. While this Court can deny this motion,  
13 then what?

14 Further, conflicts run to the County Attorney's Office because several County Attorneys are  
15 implicated in the schemes. And the conflicts run to the Superior Court where either an assigned judge  
16 is implicated in the schemes or knows judges who are implicated. To date, one former assigned judge  
17 to this case is implicated in the bribery scheme and the extortion schemes.

18 Fourth, Defendant has active federal litigation pending that seeks monetary damages and  
19 injunctive relief for violation of his civil rights pursuant to 42 U.S.C. §1983. Maricopa County is  
20 named as a defendant. Said complaint will be amended to include additional information regarding  
21 false statements set forth in the "police report" and regarding the destruction of contrary evidence. That  
22 places the County and this Court in direct conflict with Defendant.


23 Fifth is the danger to Defendant and to his family. From December 29, 2019 through January  
24 31, 2021, Defendant was hospitalized seven times resulting from the poisoning he suffered on July 7,  
25 2019. The first attempt made on Defendant's life occurred on April 21, 2019. The third attempt  
26 occurred on October 18, 2020. The fourth attempt occurred on May 9, 2021. The fifth attempt occurred  
27 at Defendant's residence in Las Vegas, Nevada on December 27, 2021. The sixth attempt occurred on  
28 December 31, 2021 near Salina, Utah. There will not be a seventh attempt.

1 Defendant will file motions to dismiss the charge. However, in the meantime, this case cannot  
2 proceed in Maricopa County and cannot proceed under the direction of the Maricopa County Attorney's  
3 Office. Having reviewed corruption issues in all county jurisdictions, Defendant recommends  
4 Coconino County, specifically within the city of Flagstaff for new venue.

5 **III. CONCLUSION.**

6 For the reasons set forth herein, Defendant requests that this Court order that venue is  
7 change immediately to the Coconino Superior Court in Flagstaff, Arizona.

8 Date: February 7, 2023

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12 JOHN H. THALER, Respondent, In Pro Per

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APPENDIX A – F ATTACHED

APPENDIX A – Summary of Governor’s Report's Findings Final

APPENDIX B – Description of Racketeering Activities

APPENDIX C – Final Amended Complain Feb 2022

APPENDIX D – All QDE – Linda Mitchell’s Reports

APPENDIX E – List of Bribed Appointed and Elected Officials

APPENDIX F – List of Brittany Married to Multiple Individuals

EXHIBIT 1 – 46 ATTACHED