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 Clerk of the Superior Court  
 By Genevieve Farler, Deputy  
 Date 06/13/2025 Time 08:38:57  
 Description Amount  
 ----- CASE# CV2025-020674 -----  
 CIVIL NEW COMPLAINT 367.00  
 -----  
 TOTAL AMOUNT 367.00  
 Receipt# 30337993

David J. Hoffa  
 State Bar No. 038052  
 c/o Mark Spencer  
 P.O. Box 30042  
 Phoenix, AZ 85046  
 (989) 627-7757  
 davjhoffa@gmail.com  
*Attorney for Plaintiff, Judicial Watch, Inc.*

**IN THE SUPERIOR COURT OF THE STATE OF ARIZONA**

**MARICOPA COUNTY**

<b>JUDICIAL WATCH, INC.</b>	) <b>Maricopa County Superior Court</b>
<b>Plaintiff,</b>	) <b>No. <u>CV 2025-020674</u></b>
<b>v.</b>	) <b>COMPLAINT FOR SPECIAL ACTION</b>
<b>KRISTIN MAYES, in her official capacity as )</b>	<b>(A.R.S. § 39-121.02)</b>
<b>Attorney General of the State of Arizona, )</b>	
<b>ARIZONA DEPARTMENT OF LAW, )</b>	
<b>an executive department of the State of )</b>	
<b>Arizona, )</b>	
<b>Defendants. )</b>	
<b>_____ )</b>	

Plaintiff Judicial Watch, Inc. brings this special action against Defendants Kristin Mayes,  
 in her official capacity as Arizona Attorney General, and the Arizona Department of Law, to

1 compel compliance with the Arizona Public Records Law, A.R.S. §§ 39-121, *et seq.* As grounds  
2 therefor, Plaintiff alleges as follows:

### 3 **PARTIES**

4 1. Plaintiff Judicial Watch, Inc. (“Plaintiff”) is a not-for-profit, educational  
5 organization incorporated under the laws of the District of Columbia and headquartered at 425  
6 Third Street SW, Suite 800, Washington, DC 20024. Plaintiff seeks to promote transparency,  
7 accountability, and integrity in government and fidelity to the rule of law. As part of its mission,  
8 Plaintiff regularly requests records from federal, state, and local governments pursuant to open  
9 records laws. Plaintiff analyzes the responses and disseminates its findings and the requested  
10 records to the American public to inform them about “what their government is up to.”

11 2. Defendant Kristin Mayes is the Attorney General for the State of Arizona, an  
12 “officer” as that term is defined in A.R.S. § 39-121.01(A)(1). Attorney General Mayes has  
13 possession, custody, and control of records to which Plaintiff seeks access.

14 3. Defendant Arizona Department of Law (commonly known as the Attorney  
15 General's Office, designated in this Complaint as “AZAGO,” and collectively with the Attorney  
16 General designated as “Defendants”) is an executive department of the State of Arizona, and a  
17 “public body” as that term is defined is A.R.S. § 39-121.01(A)(2). The Department of Law has  
18 possession, custody, and control of records to which Plaintiff seeks access.

### 19 **JURISDICTION AND VENUE**

20 4. This Court has jurisdiction over this matter pursuant to A.R.S. § 39-121.02 and  
21 Rule 3 of the Arizona Rules of Procedure for Special Actions (RPSA).

5. Venue is proper in this Court under RPSA 6(a)(2), because Defendant Mayes is an officer of the State of Arizona and Defendant Department of Law is a public body of the State of Arizona.

## GENERAL ALLEGATIONS

6. On January 13, 2025 several media outlets reported that Attorney General Mayes had formally requested case documents from U.S. Department of Justice special counsel Jack Smith's criminal investigation into President Donald Trump regarding the 2020 presidential election.

7. 12News reported that “Mayes said the documents could ensure defendants in Arizona’s fake electors case would be held accountable.”  
<https://www.12news.com/article/news/local/arizona/arizona-attorney-general-requests-jack-smiths-case-documents-on-trump/75-0d415bb9-42a2-4e55-86c4-086db68ecd75>.

8. That same day, January 13, 2025, Plaintiff sent to Defendants by both certified mail and AZAGO's online public records portal a request asking Defendants to produce the following public records pursuant to the Arizona Public Records Law, A.R.S. §§ 39-121, *et seq*:

1. Any communications and/or documents with Jack Smith and/or the DOJ Special Counsel group/team from January 1, 2022, to the completion of this request.

9. The request also asked Defendants: “If any responsive record or portion thereof is claimed to be exempt from production, please provide sufficient identifying information with

1 respect to each allegedly exempt record or portion thereof to allow us to assess the propriety of  
2 the claimed exemption (A.R.S. § 39-121.01.D.2).”

3 10. A true and correct copy of Plaintiff’s public records request is attached as **Exhibit**  
4 **A.**

5 11. A true and correct copy of the certified mail receipt for the mailing of Plaintiff’s  
6 records request is attached as **Exhibit B.**

7 12. On January 13, 2025, Plaintiff received an email from Defendants confirming  
8 receipt of the online email submission. A true and correct copy of this email is attached as  
9 **Exhibit C.**

10 13. On January 16, 2025, Plaintiff received confirmation from the United States Postal  
11 Service that the certified mail had been delivered and picked up by an agent of Defendants. A  
12 true and correct copy of the USPS tracking page indicating delivery is attached as **Exhibit D.**

13 14. On February 19, 2025, Plaintiff received an email from Defendants stating that  
14 Plaintiff’s records request was being processed. A true and accurate copy of this email is attached  
15 as **Exhibit E.**

16 15. Despite this, as of the date of this Complaint, Plaintiff has not received any records  
17 in response to Plaintiff’s records request, nor has Plaintiff received any further communication  
18 from Defendants providing any further update as to the status of Defendants’ processing of  
19 Plaintiff’s records request.

20 16. As of the date of this Complaint, after five months, Defendants have failed to (i)  
21 adequately search for and promptly furnish documents in response to Plaintiff’s request; (ii)

1 indicate when or even whether responsive records will be provided; and (iii) provide any  
2 justification for withholding responsive public records. Pursuant to A.R.S. § 39.121.01(E),  
3 Defendants' failure to promptly respond to Plaintiff's records request means that access to the  
4 requested records is deemed to be denied by Defendants.

5 **COUNT ONE**

6 **(Violation of Arizona Public Records Law, A.R.S. §§ 39-121, *et seq.* – Failure to adequately**  
7 **search for and promptly furnish responsive public records)**

8 17. Plaintiff realleges and incorporates by reference paragraphs 1 through 16 as if  
9 fully stated herein.

10 18. Article V, § 1(D) of the Arizona Constitution requires the Attorney General to  
11 “keep . . . public records, books and papers,” and to “perform such duties . . . as may be  
12 provided by law.” Article V, § 9 of the Arizona Constitution provides that “[t]he powers and  
13 duties of . . . attorney general . . . shall be as prescribed by law.” A.R.S. § 41-193(A) provides  
14 that “[t]he department of law shall be composed of the attorney general and the subdivisions of  
15 the department created as provided in this article[, and u]nless otherwise provided by law the  
16 department shall: . . . 9. Perform other duties prescribed by law.”

17 19 Among Defendants' duties provided and prescribed by law are those set by  
18 Arizona's Public Records Law, which requires public officers and public bodies to maintain all  
19 records reasonably necessary or appropriate to maintain an accurate knowledge of their official  
20 activities and activities supported by public money. A.R.S. § 39-121.01(B).

1           20.   Arizona's Public Records Law grants every person the right to examine or be  
2 promptly furnished with copies of public records. A.R.S. §§ 39-121 and 39-121.01(D). A  
3 presumption in favor of disclosure applies to all public records. To discharge its duties under the  
4 Public Records Law, public officers and public bodies must adequately search for and promptly  
5 furnish responsive public records, unless the public officer or body can present evidence  
6 demonstrating that an exception to disclosure applies.

7           21.   Access to a public record is deemed denied if the custodian fails to promptly  
8 furnish documents in response to a public records request. A.R.S. § 39-121.01(E).

9           22.   Plaintiff has a right to inspect and obtain copies of the public records requested on  
10 January 13, 2025 (Exhibit A), unless Defendants can present evidence justifying nondisclosure.

11          23.   Defendants have violated Arizona's Public Records Law by failing for five months  
12 to promptly furnish public records requested on January 13, 2025 (Exhibit A) to Plaintiff.

13          24.   By doing so, Defendants have failed to perform a duty required by law as to which  
14 Defendants have no discretion and/or has failed to properly exercise discretion which  
15 Defendants have a duty to exercise.

16          25.   By doing so, Defendants have proceeded without or in excess of jurisdiction and  
17 legal authority.

18          26.   Defendants' conduct is arbitrary and capricious and/or an abuse of discretion.

19          27.   An actual controversy exists between Plaintiff and Defendants regarding  
20 Defendants' duties under the Arizona Public Records Law, and a Special Action to resolve this  
21 controversy is authorized by statute, A.R.S. § 39-121.02.

28. Plaintiff is being irreparably harmed and damaged by Defendants' ongoing violations of Plaintiff's right to access public records. Plaintiff will continue to be irreparably harmed and damaged unless the relief requested in this special action is granted.

**COUNT TWO**

**(Violation of Arizona Public Records Law, A.R.S. §§ 39-121, *et seq.* – Failure to furnish an index of withheld public records)**

29. Plaintiff realleges and incorporates by reference paragraphs 1 through 16 and 18 through 20 as if fully stated herein.

30. A.R.S. § 39-121.01(D)(2) provides: “If requested, the custodian of the records of an agency shall also furnish an index of records or categories of records that have been withheld and the reasons the records or categories of records have been withheld from the requesting person. . . . For the purposes of this paragraph, 'agency' has the same meaning prescribed in section 41-1001.” An “agency” under A.R.S. § 41-1001 includes “any . . . department [or] officer . . . of this state, including the agency head and one or more members of the agency head or agency employees or other persons directly or indirectly purporting to act on behalf or under the authority of the agency head, whether created under the Constitution of Arizona or by enactment of the legislature.”

31. Access to a public record is deemed denied if the custodian is an “agency” as defined under A.R.S. § 41-1001 and the agency “fails to provide to the requesting person an index of any record or categories of records that are withheld from production pursuant to subsection D, paragraph 2 of this section.” A.R.S. § 39-121.01(E).

1           32. Plaintiff has a right to receive an index of responsive records or categories of  
2 responsive records that Defendants have withheld from production in response to Plaintiff's  
3 January 13, 2025, records request (Exhibit A). A.R.S. § 39-121.01(D)(2). This index must  
4 include "the reasons the records or categories of records have been withheld." *Id.*

5           33. Defendants have violated Arizona's Public Records Law by failing to provide such  
6 an index to Plaintiff regarding the responsive records withheld in response to Plaintiff's January  
7 13, 2025, records request (Exhibit A).

8           34. By doing so, Defendants have failed to perform a duty required by law as to which  
9 Defendants have no discretion and/or has failed to properly exercise discretion which  
10 Defendants have a duty to exercise.

11          35. By doing so, Defendants have proceeded without or in excess of jurisdiction and  
12 legal authority.

13          36. Defendants' conduct is arbitrary and capricious and/or an abuse of discretion.

14          37. An actual controversy exists between Plaintiff and Defendants regarding  
15 Defendants' duties under the Arizona Public Records Law, and a Special Action to resolve this  
16 controversy is authorized by statute, A.R.S. § 39-121.02.

17          38. Plaintiff is being irreparably harmed and damaged by Defendants' ongoing  
18 violations of Plaintiff's right to an index under the Arizona Public Records Law. Plaintiff will  
19 continue to be irreparably harmed and damaged unless the relief requested in this special action  
20 is granted.



1 **PRAYER FOR RELIEF**

2 **WHEREFORE**, Plaintiff respectfully requests that the Court enter judgment against  
3 Defendants as follows:

4 A. Directing Defendants to immediately comply with A.R.S. §§ 39-121, *et*  
5 *seq.*, to conduct an adequate search for records responsive to Plaintiff's  
6 public records request, and to provide Plaintiff with copies of all public  
7 records requested on January 13, 2025, unless an exception to disclosure  
8 supported by specific evidence applies;

9 B. Permanently enjoining Defendants from continuing to fail to adequately  
10 search for all such public records, and from continuing to withhold any  
11 such public records unless an exception to disclosure supported by evidence  
12 applies;

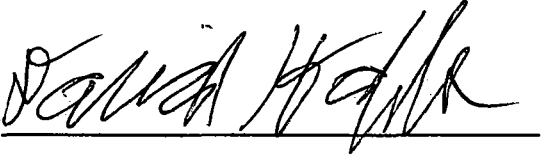
13 C. Directing Defendants to immediately comply with A.R.S. §§ 39-121, *et*  
14 *seq.*, to provide an index that (i) lists responsive records or categories of  
15 responsive records to Plaintiff's public records request that have been  
16 withheld from disclosure, and (ii) provides the reasons the responsive  
17 records or categories of responsive records have been withheld from disclosure;

18 D. Permanently enjoining Defendants from continuing to fail to provide such  
19 an index;  
20  
21

1 E. Awarding attorney's fees and other legal costs reasonably incurred by  
2 Plaintiff in this action pursuant to A.R.S. § 39-121.02(B) and RPSA 7(i);  
3 and

4 F. Granting Plaintiff such other and further relief as the Court deems just and  
5 proper.  
6

7 **RESPECTFULLY SUBMITTED** on June 13, 2025.

8   
9

10 David J. Hoffa

11 State Bar No. 038052

12 c/o Mark Spencer

13 P.O. Box 30042

14 Phoenix, AZ 85046

15 (989) 627-7757

16 davjhoffa@gmail.com

17 *Attorney for Plaintiff*  
18  
19  
20  
21

## **EXHIBIT A**



**Judicial  
Watch®**  
*Because no one  
is above the law!*

January 13, 2025

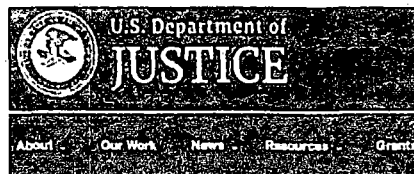
**CERTIFIED MAIL**

Kris Mayes, Arizona Attorney General  
Arizona Attorney General's Office  
2005 N Central Ave.  
Phoenix, AZ 85004

Re: **Records under Public Records Law**  
**A.R.S. § 39-101 through 39-221**

Ms. Mayes;

The U.S. Department of Justice ("DOJ") announced on-line the appointment of Jack Smith as Special Counsel. It was stated, "On November 18, 2022, Jack Smith was appointed by Attorney General Merrick B. Garland to serve as the Special Counsel."



**Special Counsel Jack Smith**

**About**

On November 18, 2022, the U.S. Department of Justice announced the appointment of Jack Smith as Special Counsel. Mr. Smith is a former federal prosecutor who served as Deputy Assistant Attorney General for the Office of Inspector General, U.S. Department of Justice, from 2017 to 2022.

<https://www.justice.gov/scs-smith>

On January 11, 2025, *CBS News* reported on the resignation of Jack Smith and stated that he was appointed, "...to take over two Justice Department investigations into Trump (*President-elect Donald Trump*), one related to his conduct after the 2020 presidential election, and another tied to his handling of classified records after he left office. The cases both resulted in criminal charges against Trump."

<https://www.cbsnews.com/news/jack-smith-special-counsel-oversaw-trump-investigations-resigns-justice-department/>

The efforts and expenses of your office to engage in evaluating Mr. Trump via criminal legal action/efforts (*i.e. death threats, fake electors*) in a similar capacity as Mr. Smith prompts

the submission of this request.

Pursuant to the provisions of the Arizona Public Records Law (*APRL*), A.R.S. §39-101 through §39-221 please provide copies of:

1. Any communications and/or documents with Jack Smith and/or the DOJ Special Counsel group/team from January 1, 2022, to the completion of this request.

These records are considered public under A.R.S. §39-101 through §39-221. To the extent applicable, the following definitions apply to the request:

**“COMMUNICATION(S)”** means every manner or method of disclosure, exchange of information, statement, or discussion between or among two or more persons, including but not limited to, face-to-face and telephone conversations, correspondence, memoranda, telegrams, telexes, email messages, voice-mail messages, text messages, electronic messaging (including instant messaging and chats delivered through Microsoft Teams, Google Workspace, Zoom Team Chat, or other similar systems), meeting minutes, discussions, releases, statements, reports, publications, and any recordings or reproductions thereof.

**“DOCUMENT(S)”** or **“RECORD(S)”** mean any kind of written, graphic, or recorded matter, however produced or reproduced, of any kind or description, whether sent, received, or neither, including drafts, originals, non-identical copies, and information stored magnetically, electronically, photographically or otherwise. As used herein, the terms **“DOCUMENT(S)”** or **“RECORD(S)”** include, but are not limited to, studies, papers, books, accounts, letters, diagrams, pictures, drawings, photographs, correspondence, telegrams, cables, text messages, emails, memoranda, notes, notations, work papers, intra-office and inter-office communications, communications to, between and among employees, contracts, financial agreements, grants, proposals, transcripts, minutes, orders, reports, recordings, or other documentation of telephone or other conversations, interviews, affidavits, slides, statement summaries, opinions, indices, analyses, publications, questionnaires, answers to questionnaires, statistical records, ledgers, journals, lists, logs, tabulations, charts, graphs, maps, surveys, sound recordings, data sheets, computer printouts, tapes, discs, microfilm, and all other records kept, regardless of the title, author, or origin.

**“PERSON”** means individuals, entities, firms, organizations, groups, committees, regulatory agencies, governmental entities, business entities, corporations, partnerships, trusts, and estates.

**“REFERS,” “REFERRING TO,” “REGARDS,” REGARDING,” “RELATES,” “RELATING TO,” “CONCERNS,” “CONCERNING”** or **“PERTAINS TO”** mean, containing, alluding to, responding to, commenting upon, discussing, showing, disclosing, explaining, mentioning, analyzing, constituting, comprising, evidencing, setting forth, summarizing, or characterizing, either directly or indirectly, in whole or in part.

Pursuant to A.R.S. §39-121.01.D.1, records must be furnished promptly. We look forward to your prompt response. Any response or records that can be delivered via e-mail attachments are certainly acceptable. Additionally, all responsive records in an electronic format


("PDF" is preferred) is appreciated. We also are willing to accept a "rolling production" of responsive records if it will facilitate a more timely production.

If any responsive record or portion thereof is claimed to be exempt from production, please provide sufficient identifying information with respect to each allegedly exempt record or portion thereof to allow us to assess the propriety of the claimed exemption (*A.R.S. §39-121.01.D.2.*) Additionally, any reasonably segregable portion of a record otherwise exempt from disclosure is required to be made available after deletion of the portions that are exempted by law.

Finally, the information sought is for non-commercial purposes. Please be advised that if the records are not provided to our office or if we do not hear from your office we will assume that your office is refusing to comply with our Public Records Request. If you do not understand this request or any portion thereof, or if you feel you require clarification of this request or any portion thereof, please contact us immediately at 602.510.7875 or [mspencer@judicialwatch.org](mailto:mspencer@judicialwatch.org). The local Arizona address is:

Judicial Watch Inc.  
PO Box 30042  
Phoenix, AZ 85046

Sincerely,

A handwritten signature in black ink, appearing to be 'M Spencer', with a long horizontal flourish extending to the right.

MARK SPENCER  
Southwest Projects Coordinator  
Judicial Watch, Inc.

## **EXHIBIT B**

9589 0710 0225 0070 6200 8894 35

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
*Domestic Mail Only*

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

**OFFICIAL USE**

Certified Mail Fee

\$

Extra Services & Fees (check box, add fee as appropriate)

- |  |    |       |
|--|----|-------|
| <input type="checkbox"/> Return Receipt (hardcopy)           | \$ | _____ |
| <input type="checkbox"/> Return Receipt (electronic)         | \$ | _____ |
| <input type="checkbox"/> Certified Mail Restricted Delivery  | \$ | _____ |
| <input type="checkbox"/> Adult Signature Required            | \$ | _____ |
| <input type="checkbox"/> Adult Signature Restricted Delivery | \$ | _____ |

Postage

\$

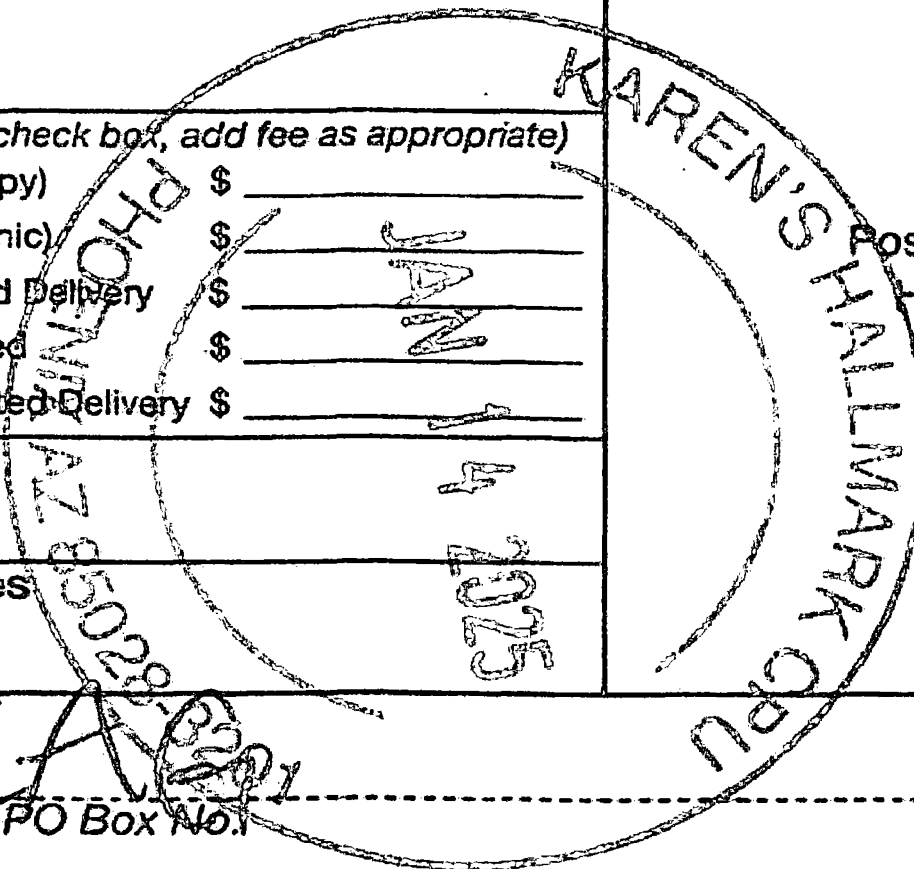
Total Postage and Fees

\$

Sent To

Street and Apt. No., or PO Box No.

City, State, ZIP+4®



Postmark  
Here



## Certified Mail service provides the following benefits:

- ❑ A receipt (this portion of the Certified Mail label).
- ❑ A unique identifier for your mailpiece.
- ❑ Electronic verification of delivery or attempted delivery.
- ❑ A record of delivery (including the recipient's signature) that is retained by the Postal Service™ for a specified period.

### Important Reminders:

- ❑ You may purchase Certified Mail service with First-Class Mail®, First-Class Package Service®, or Priority Mail® service.
  - ❑ Certified Mail service is *not* available for international mail.
  - ❑ Insurance coverage is *not* available for purchase with Certified Mail service. However, the purchase of Certified Mail service does not change the insurance coverage automatically included with certain Priority Mail items.
  - ❑ For an additional fee, and with a proper endorsement on the mailpiece, you may request the following services:
    - Return receipt service, which provides a record of delivery (including the recipient's signature). You can request a hardcopy return receipt or an electronic version. For a hardcopy return receipt, complete PS Form 3811, *Domestic Return Receipt*; attach PS Form 3811 to your mailpiece;
- for an electronic return receipt, see a retail associate for assistance. To receive a duplicate return receipt for no additional fee, present this USPS®-postmarked Certified Mail receipt to the retail associate.
- Restricted delivery service, which provides delivery to the addressee specified by name, or to the addressee's authorized agent.
  - Adult signature service, which requires the signee to be at least 21 years of age (not available at retail).
  - Adult signature restricted delivery service, which requires the signee to be at least 21 years of age and provides delivery to the addressee specified by name, or to the addressee's authorized agent (not available at retail).
- ❑ To ensure that your Certified Mail receipt is accepted as legal proof of mailing, it should bear a USPS postmark. If you would like a postmark on this Certified Mail receipt, please present your Certified Mail item at a Post Office™ for postmarking. If you don't need a postmark on this Certified Mail receipt, detach the barcoded portion of this label, affix it to the mailpiece, apply appropriate postage, and deposit the mailpiece.
- IMPORTANT: Save this receipt for your records.**

## **EXHIBIT C**

## **Mark Spencer**

---

**From:** AGInfo <AGInfo@azag.gov>  
**Sent:** Monday, January 13, 2025 12:43 PM  
**To:** Mark Spencer  
**Subject:** [EXTERNAL] Automatic reply: Judicial Watch Public Records Request - DOJ Jack Smith Interaction

Thank you for contacting the Office of Arizona Attorney General Kris Mayes. We will review the information you have provided and follow up with you as soon as we can. We appreciate you taking the time to share your concerns with us.

## **EXHIBIT D**

Tracking Number:

Remove X

9589071052700079889435

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item has been delivered to an agent. The item was picked up at USPS at 7:46 am on January 16, 2025 in PHOENIX, AZ 85004.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered to Agent

Delivered to Agent, Picked up at USPS

PHOENIX, AZ 85004

January 16, 2025, 7:46 am

See All Tracking History

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates



USPS Tracking Plus®



Product Information



See Less ^

Track Another Package



Enter tracking or barcode numbers

## Need More Help?

Contact USPS Tracking support for further assistance.

**FAQs**

## **EXHIBIT E**

## Mark Spencer

---

**From:** PublicRecords <PublicRecords@azag.gov>  
**Sent:** Wednesday, February 19, 2025 11:10 AM  
**To:** Mark Spencer  
**Subject:** RE: [EXTERNAL] Public Records Request Submission: PRR-2025-124551-1950  
**Attachments:** Spencer, Mark Public Records Request\_Submission\_ 1.13.25.pdf

Hi Mark,

Just wanted to send a quick update that we are processing attached records request **PRR-2025-124551-1950** and do plan to respond.

Sincerely,

### Public Records



Arizona Attorney General Kris Mayes  
2005 N. Central Ave.  
Phoenix, AZ 85004  
[PublicRecords@azag.gov](mailto:PublicRecords@azag.gov)  
<https://www.azag.gov/>

### Details of Request

#### Records Requested:

The U.S. Department of Justice ("DOJ") announced on-line the appointment of Jack Smith as Special Counsel. It was stated, "On November 18, 2022, Jack Smith was appointed by Attorney General Merrick B. Garland to serve as the Special Counsel."

<https://www.justice.gov/sco-smith>

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The efforts and expenses of your office to engage in evaluating Mr. Trump via criminal legal action/efforts (i.e. death threats, fake electors) in a similar capacity as Mr. Smith prompts the submission of this request.



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1. Any communications and/or documents with Jack Smith and/or the DOJ Special Counsel group/team from January 1, 2022, to the completion of this request.

Intake Number: **PRR-2025-124551-1950**