

**Dr. Michelle Pettitt**

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**Date:** June 16, 2025

**To:**

State Bar of Arizona  
Office of Attorney Regulation  
4201 N. 24th Street, Suite 100  
Phoenix, AZ 85016-6266  
Attn: Katherine L. Hyde  
Re: File No. 25-1279, Complainant: Michelle Pettitt  
Via Email ([discipline@azbar.org](mailto:discipline@azbar.org))

**Dear Ms. Hyde and State Bar of Arizona,**

I, Dr. Michelle Pettitt, submit this response to Bradley Beauchamp's reply dated June 11, 2025, to my complaint alleging violations of the Arizona Rules of Professional Conduct (ER 1.7, ER 3.8, and ER 8.4).

Mr. Beauchamp's response misrepresents facts, downplays his conflicts of interest, and fails to address the *significant* appearance of impropriety in his conduct. I provide additional evidence and clarification to support my allegations, emphasizing his ethical misconduct in prosecuting my case despite conflicts, pursuing baseless charges, and withholding critical context from the grand jury. I respectfully request that the State Bar investigate thoroughly and impose appropriate disciplinary action.

## **Response to Beauchamp's Defenses**

### **1. ER 1.7: Conflict of Interest – Current Clients**

Mr. Beauchamp denies being a protected party under the June 2022 Injunction Against Workplace Harassment (IAWH) and minimizes his role as a supplemented (paid) coach for the Miami Unified School District (MUSD). These claims are factually inaccurate and ignore the significant appearance of impropriety.

- **Protected Party Under IAWH:** The IAWH explicitly protects all paid and non-paid staff of MUSD and any persons "performing official work duties..." for MUSD. Mr. Beauchamp, as a paid football and baseball coach, falls within this scope. I will provide MUSD Governing Board minutes confirming his paid status and a letter from Superintendent Sherry Dorathy stating that Beauchamp was listed as a paid coach (not a volunteer) to allow him to drive district vehicles, as volunteers are prohibited

from doing so. His role in performing official duties for MUSD creates a direct personal interest in my prosecution, as a conviction would reinforce the IAWH's protections for him. This conflict is *more significant* than Judge Bryan Chambers' wife's employment at MUSD, which prompted Chambers' recusal. Beauchamp's claim that his name does not appear on the IAWH (Exhibit A) is misleading, as the injunction's broad language encompasses all staff, including him.

- **Paid Coach and Son's Coach:** Contrary to Beauchamp's claim of limited involvement, he coached my son for his entire four years of high school (2018–2022), including throughout the implementation of the PCM and the three-year litigation (2021–2025). His paid role gave him financial and professional ties to MUSD, which initiated the Parent Contact Management Plan (PCM) and IAWH against me. His personal knowledge of my family through coaching created a bias, especially in the context of my custody dispute. Beauchamp, optimistic that my son, a “stellar athlete” and star player as MUSD's running back, would accept the Texas scholarship and bring notoriety to MUSD, dropped the trespassing charges against him *solely because of his football status* (Per Deputy County Attorney, Travis Shields). This ongoing relationship with MUSD and my family undermines his claim of impartiality.
- **State's Contradictory Recusal Positions:** The State's opposition to Beauchamp's disqualification while supporting Judge Chambers' recusal on similar grounds (MUSD employment ties) raises serious ethical questions about consistency. This contradiction suggests selective application of ethical standards, further eroding public trust in the prosecution's fairness.
- **No Delay in Disqualification Motion:** Beauchamp falsely claims I delayed filing motions to disqualify until plea negotiations failed. As a physician, I rejected all plea offers, including those offered during misdemeanor court, due to the risk of sanctions by the Arizona Medical Board, which could jeopardize my license and ability to practice. My motions to disqualify were filed promptly based on evidence of Beauchamp's conflicts, not tactical delay.
- **Appearance of Impropriety:** Beauchamp's close relationship with former MUSD Principal Glen Lineberry, who initiated the IAWH, exacerbates the appearance of impropriety. My ex-boyfriend and his attorney, former County Attorney Jerry DeRose, knew about the ban **three weeks** before I was informed, suggesting coordination between former Principal Lineberry, Attorney DeRose and County Attorney Beauchamp (see email from DeRose to Ansel). Lineberry's direct call to Beauchamp (not law enforcement) to complain about my lawful campaigning on campus further indicates an improper personal influence over the prosecution. This relationship, combined with Beauchamp's MUSD ties, creates a perception of bias far beyond what the *Gomez* factors (*State v. Chambers*, 255 Ariz. 464, 533 P.3d 195 (2023)) addressed in court.

**Conclusion:** Beauchamp's failure to recuse, despite being a protected party under the IAWH, a paid MUSD coach, and my son's coach, violated ER 1.7(a)(2). His conflicts created a significant risk of bias, and the appearance of impropriety undermines public confidence in the justice system.

## 2. ER 3.8: Special Responsibilities of a Prosecutor

Beauchamp denies pursuing charges without probable cause and withholding exculpatory evidence. His response mischaracterizes my allegations and ignores critical context.

- **No Probable Cause (ER 3.8(a)):** In one sentence, Beauchamp admits he dismissed misdemeanor charges *because* they met the elements of aggravated harassment but in the next sentence, he claims Lineberry was fine with dismissing charges unless I violated the IAWH. I did not violate the IAWH, yet Beauchamp filed three felony charges based on Lineberry's complaint that I was campaigning on campus—a lawful activity. In a phone call with my attorney, Rachel Moss, Beauchamp admitted refiling felony charges in Superior Court *because* Lineberry reported my campus presence, unaware that the PCM had been lifted (see email from Joel Sannes) and that my presence was lawful. He never reviewed the emails before filing, relying solely on Lineberry's word. The emails were sent to comply with the PCM and IAWH, requesting permission to be on campus as required, and were not “baseless” or “purposeless.” For four months, I sent one weekly email requesting permission. And for four months, those requests were granted. But Lineberry stated that he realized the requests were automated and therefore demanded daily requests, escalating the volume. The Maricopa County IAWH court was not informed of this requirement, rendering the injunction's restrictions ambiguous. Beauchamp's failure to investigate and reliance on Lineberry's unverified complaint lacked probable cause, violating ER 3.8(a).
- **Withholding Exculpatory Evidence (ER 3.8(d)):** I do not accuse the State of withholding Boomerang logs, as Beauchamp claims; I received those in July 2024. My allegation is that the emails themselves were withheld from the grand jury, depriving it of critical context. The emails were one-line requests for campus access, sent to comply with the PCM. Boomerang logs (to be provided) confirm they were scheduled for 8 a.m. and 11 a.m. MST but sent seven hours earlier due to a UTC time zone error, proving their unintentional timing (see Boomerang IT logs). This context was essential to show the emails were lawful and not harassing. Beauchamp's failure to present them violated ER 3.8(d) and *Brady v. Maryland* (373 U.S. 83 (1963)), as it misled the grand jury. The Superior Court's denial of my Motion to Remand does not absolve this ethical lapse, as the State Bar evaluates conduct independently.
- **Legal Implications of Felony Charges:** Filing three felony charges for my lawful presence on campus to vote and campaign was baseless. A.R.S. § 16-1018 permits campaigning at polling places (MUSD campus) during elections, and the PCM's lifting allowed my presence at public events. Beauchamp's admission that Lineberry “immediately reported” my campaigning to him—not law enforcement—highlights the lack of a formal complaint or investigation. Lineberry's direct access to Beauchamp, bypassing standard procedures, underscores their close relationship and the improper influence on charging decisions. This action lacked probable cause and was retaliatory, violating ER 3.8(a).

**Conclusion:** Beauchamp pursued charges without probable cause, relying on Lineberry's unverified claims and failing to investigate the PCM's status or email context. Withholding the

emails from the grand jury violated ER 3.8(d), as their lawful purpose was material to my defense.

### 3. ER 8.4: Misconduct

Beauchamp's actions involved dishonesty and prejudice to the administration of justice.

- **Dishonesty (ER 8.4(c)):** By withholding the emails' context from the grand jury, Beauchamp misrepresented the nature of my actions, implying harassment where none existed. This omission was dishonest and prolonged baseless prosecutions.
- **Prejudice to Justice (ER 8.4(d)):** Beauchamp's failure to recuse, reliance on Lineberry's personal complaints, and pursuit of baseless charges undermined public trust. His history of complaints, including sexual harassment allegations (publicly reported, to be provided if requested), suggests a pattern of impunity, enabled by prosecutorial immunity. This perception of unchecked misconduct, especially in a small community, erodes confidence in the justice system.

**Conclusion:** Beauchamp's conduct violated ER 8.4 by engaging in dishonest omissions and prejudicial actions, exacerbated by the appearance of impropriety.

### Additional Clarifications

- **Prior Conviction:** Beauchamp references my 1995 domestic violence conviction, for which I served (less than) 3.75 years. I have never denied this conviction and was not "admonished" about disclosing it, as Beauchamp claims. The conviction's set-aside under A.R.S. § 13-907 and its irrelevance to this case (30 years prior) make its inclusion prejudicial and misleading.
- **Defense Costs:** Beauchamp questions my \$200,000 in legal fees. This amount is not outrageous for defending three felony charges over three years, with two trials, multiple motions, and constant court appearances. His actions threatened my medical license and freedom, necessitating robust defense.
- **Campaigning Allegation:** Beauchamp's claim that I abused my voting permission by campaigning is false. I was legally on campus to vote and campaign, as permitted by A.R.S. § 16-1018. No law enforcement report or complaint was filed; Lineberry's direct call to Beauchamp confirms their improper relationship and lack of due process.
- **Boomerang Logs:** The logs, provided to the State on July 9, 2024, confirm the UTC error, supporting my defense that the emails' timing was unintentional. Beauchamp's dismissal of this as a "defense theory" ignores its exculpatory value.

### Requested Action

I request that the State Bar:

1. Investigate Beauchamp's violations of ER 1.7, ER 3.8, and ER 8.4, considering the evidence I will provide (IAWH, Governing Board minutes, Dorathy's letter, Boomerang logs, court records, recorded meetings, and witness statements).
2. Impose disciplinary action, such as suspension or reprimand, to address the harm caused and deter future misconduct.
3. Review responses from Kayla Evans, Sheriff's Office (Wingett, Shaw), and MUSD, which will further substantiate my claims.
4. Consider the appearance of impropriety and Beauchamp's pattern of complaints in assessing public trust.

I am prepared to provide all evidence, participate in interviews, and cooperate fully. Please contact me at the above address, email, or phone number.

**Sincerely,**

Dr. Michelle Pettitt

**Attachments:**

- List of evidence to be provided upon request (to avoid premature disclosure).