

Count One: <https://youtube.com/live/VgJpoqeeZiY?feature=share>

Count One is legally unsupported because Mr. Myers did not commit the crime of harassment on October 18, 2024. On October 18, 2024, Mr. Myers made a U-turn behind the University of Arizona law school. Mr. Myers was charged with the misdemeanor offense of interfering with judicial proceedings and was arrested on October 22, 2024 for that charge. That charge was dismissed for lack of probable cause. The U-turn on October 18, 2024 does not meet the definition of harassment pursuant to A.R.S. 13-2921, and therefore the allegation of violation of A.R.S. 13-2921.01(A)(1) fails.

Count Two: <https://youtu.be/9am4ZBEq6TI>

Count Two is factually unsupported because Mr. Myers did not commit any act of harassment on October 21, 2024. The complaint does not identify a factual basis for Count Two. Had Mr. Myers committed an act of harassment on October 21, 2024, he would have been arrested for that violation when he was arrested on October 22, 2024. But he was not.

Count Three: <https://youtube.com/live/Iv7VEPtR0mc?feature=share>

Count Three is legally unsupported because Mr. Myers did not commit the crime of harassment on January 22, 2025. On January 22, 2025, Lane Myers released the “for the record” (FTR) hearing provided by Pima County Superior Court and discussed legal issues and arguments contained in Mr. Myers’s appeal of the injunction against harassment filed in Division II of the Arizona Court of Appeals. The appeal case number is 2-CA-CV-2025-00017. Public discussion and disclosure of these topics is permissible under Model Rule of Professional Conduct 3.6. The FTR is public record. This conduct does not amount to harassment pursuant to A.R.S. 13-2921 because it was not done in a manner that harasses, was not directed at Shannon Walker, and did not cause a communication with Shannon Walker. Shannon Walker may have voluntarily sought out and viewed the video, but Mr. Myers did not send or transmit it to her in any way.

Count Four: <https://youtu.be/IZKfRcADH4E>

Count Four is legally unsupported because Mr. Myers did not commit the crime of harassment on January 24, 2025. On January 24, 2025, Mr. Myers posted four injunction hearings in a YouTube video. The four videos were all public records obtained from the Pima County Superior Court. The video did not contain any other statements or comments. This conduct does not amount to harassment pursuant to A.R.S. 13-2921 because it was not done in a manner that harasses, was not directed at Shannon Walker, and did not cause a communication with Shannon Walker.

Shannon Walker may have voluntarily sought out and viewed the video, but Mr. Myers did not send or transmit it to her in any way.

Count Five: https://youtube.com/live/HWsPVFp3c_4?feature=share

Count Five is legally unsupported because Mr. Myers did not commit the crime of harassment on January 27, 2025. On January 27, 2025, Mr. Myers posted a video discussing the appeal case number (listed above) and the lawsuit he intends to file once the appeal has concluded. He also discussed his belief that the injunction hearings lacked legal merit. This is First Amendment-protected speech and does not rise to the level of harassment because it was not done in a manner that harasses, was not directed at Shannon Walker, and did not cause a communication with Shannon Walker. Shannon Walker may have voluntarily sought out and viewed the video, but Mr. Myers did not send or transmit it to her in any way.

Count Six: <https://youtu.be/rJCvOqFQJeM>

Count Six is legally unsupported because Mr. Myers did not commit the crime of harassment on February 22, 2025. On February 22, 2025, Mr. Myers posted a video of the injunction hearings and discussed his belief that Shannon Walker committed perjury during the injunction hearings. The recordings of the hearings are public record. The video includes Mr. Myers doing legal research on the Westlaw legal research platform. This is First Amendment-protected speech and does not rise to the level of harassment because it was not done in a manner that harasses, was not directed at Shannon Walker, and did not cause a communication with Shannon Walker. Shannon Walker may have voluntarily sought out and viewed the video, but Mr. Myers did not send or transmit it to her in any way.

Count Seven: <https://youtube.com/shorts/Yj5-PbHwVTI?feature=share>

Count Seven is legally unsupported because a voicemail would fall under electronic harassment pursuant to A.R.S. 13-2916, not harassment pursuant to A.R.S. 13-2921. The voicemail does not fall under any of the subsections of 13-2916(A). The voicemail was a communication to a public employee for a legitimate purpose regarding matters of public interest and therefore is constitutionally protected speech or activity pursuant to A.R.S. 13-2916(C)(1). Furthermore, the voicemail was not an act of harassment or done in a harassing manner and therefore does not violate A.R.S.13-2921.

Count Eight: <https://youtu.be/r2QAXzbRZS8>

Count Eight is legally unsupported because a social media video would fall under electronic harassment pursuant to A.R.S. 13-2916, not harassment pursuant to A.R.S. 13-2921. On September 24, 2024, Mr. Myers posted a video on YouTube in which he showed Shannon Walker's public webpage on the University of Arizona website. The video does not fall under any of the subsections of 13-2916(A). The video was regarding a public employee for a legitimate purpose regarding matters of public interest and therefore is constitutionally protected speech or activity pursuant to A.R.S. 13-2916(C)(1). Furthermore, the video was not an act of harassment or done in a harassing manner and it did not cause a communication with Shannon Walker. Shannon Walker may have voluntarily sought out and viewed the video, but Mr. Myers did not send or transmit it to her in any way. Therefore, it also does not fall under any of the subsections of 13-2921(A).

Count Nine: <https://youtube.com/live/Vlon5IF-ggs?feature=share>

Count Nine is legally unsupported because a social media video would fall under electronic harassment pursuant to A.R.S. 13-2916, not harassment pursuant to A.R.S. 13-2921. On October 2, 2024, Mr. Myers posted a video on YouTube regarding Pima County Attorney Samantha Walker and Mr. Myers's pending court cases in Pima County Justice Court at that time. The video was not regarding or discussing Shannon Walker. Samantha Walker may have been confused for Shannon Walker. The video does not fall under any of the subsections of 13-2916(A). The video was regarding a public employee for a legitimate purpose regarding matters of public interest and therefore is constitutionally protected speech or activity pursuant to A.R.S. 13-2916(C)(1). Furthermore, the video was not an act of harassment or done in a harassing manner and it did not cause a communication with Shannon Walker. Shannon Walker may have voluntarily sought out and viewed the video, but Mr. Myers did not send or transmit it to her in any way. The video also did not discuss anything relating to Shannon Walker. Therefore, it also does not fall under any of the subsections of 13-2921(A).

Count Ten: <https://youtu.be/DMTDP-MY7Y>

Count Ten is legally unsupported because a social media video would fall under electronic harassment pursuant to A.R.S. 13-2916, not harassment pursuant to A.R.S. 13-2921. On October 8, 2024, Mr. Myers posted a video regarding City of Tucson prosecutor Matt Walker's malicious attempt at filing a Rule 11 motion against Mr. Myers. Matt Walker is Shannon Walker's husband. The video was regarding a public employee for a legitimate purpose regarding matters of public interest and therefore is constitutionally protected speech or activity pursuant to A.R.S. 13-2916(C)(1). Furthermore, the video was not an act of harassment or done in a harassing manner and it did not cause a communication with Shannon Walker. Shannon Walker may have voluntarily sought out and viewed the video, but Mr. Myers did not send or transmit it to her in

any way. The video also did not discuss anything relating to Shannon Walker. Therefore, it also does not fall under any of the subsections of 13-2921(A).

Count Eleven: <https://youtube.com/live/sM60RGnoF3Y?feature=share>

Count Eleven is factually and legally unsupported because Mr. Myers did not commit an act of harassment or any of the subsections of 13-2921(A) in a harassing manner. On October 11, 2024, Mr. Myers went to the James E. Rogers College of Law in his capacity as an investigative journalist. Mr. Myers walked around the College of Law offices and had multiple conversations with law school employees. Mr. Myers went to the law library and used the law library. Mr. Myers never spoke or communicated in any way with Shannon Walker, who was not present at the College of Law. When Shannon Walker's co-workers offered to take Mr. Myers to Shannon Walker's office, he declined because he did not want to intrude on Shannon Walker. Even if Shannon Walker had been present at the College of Law that day, Mr. Myers would not have gone to speak to her. All the interactions that Mr. Myers had with College of Law employees on October 11, 2024 are video recorded. Mr. Myers behaved in a polite and non-threatening manner during all interactions with College of Law employees. Mr. Myers did not cause a communication with Shannon Walker on October 11, 2024.

Count Twelve: <https://youtube.com/shorts/BJpd5JJ5x04?feature=share>

Count Twelve is legally unsupported because a voicemail would fall under electronic harassment pursuant to A.R.S. 13-2916, not harassment pursuant to A.R.S. 13-2921. The voicemail does not fall under any of the subsections of 13-2916(A). The voicemail was a communication to a public employee for a legitimate purpose regarding matters of public interest and therefore is constitutionally protected speech or activity pursuant to A.R.S. 13-2916(C)(1). Furthermore, the voicemail was not an act of harassment or done in a harassing manner and therefore does not violate A.R.S. 13-2921.

Count Thirteen: <https://youtube.com/shorts/tKARsonViiw?feature=share>

<https://youtu.be/uHTVF-29iYw>

Count Thirteen is legally unsupported because a voicemail would fall under electronic harassment pursuant to A.R.S. 13-2916, not harassment pursuant to A.R.S. 13-2921. The voicemail does not fall under any of the subsections of 13-2916(A). The voicemail was a communication made in Mr. Myers's capacity as an investigative journalist to a public employee for a legitimate purpose regarding matters of public interest, and therefore is constitutionally protected speech or activity pursuant to A.R.S. 13-2916(C)(1). Furthermore, the voicemail was

not an act of harassment or done in a harassing manner and therefore does not violate A.R.S. 13-2921.

The charge of harassment in Count Thirteen is further legally unsupported because a social media video would fall under electronic harassment pursuant to A.R.S. 13-2916, not harassment pursuant to A.R.S. 13-2921. On October 16, 2024, Mr. Myers posted a video playing the voicemail he left for Shannon Walker that same day. The video was regarding a public employee for a legitimate purpose regarding matters of public interest and therefore is constitutionally protected speech or activity pursuant to A.R.S. 13-2916(C)(1). Furthermore, the video was not an act of harassment or done in a harassing manner and it did not cause a communication with Shannon Walker. Shannon Walker may have voluntarily sought out and viewed the video, but Mr. Myers did not send or transmit it to her in any way. Therefore, it also does not fall under any of the subsections of 13-2921(A).

Count Fourteen: ALL VIDEOS LINKED

Count Fourteen is legally unsupported because Mr. Myers did not engage in a course of conduct directed towards Shannon Walker. Mr. Myers posted YouTube videos regarding the injunction against harassment, his legal arguments and analysis in the case, and the appeal of that case. None of those videos were directed towards Shannon Walker. Shannon Walker may have voluntarily sought out and viewed Mr. Myers's videos, but Mr. Myers never sent or transmitted any video to Shannon Walker in any way. Further, Mr. Myers never caused a communication with Shannon Walker through or in any YouTube video. Because no single act that Mr. Myers engaged in rises to the level of criminal harassment, the combination of acts also does not rise to the level of harassment.

Mr. Myers has not contacted Shannon Walker since October 15, 2024.

All of the videos that Mr. Myers has posted on YouTube discussing Shannon Walker and/or the injunction against harassment are constitutionally protected speech. For that reason, Judge Griffin, when granting the injunction against harassment, explicitly found that he could not order Mr. Myers to remove any of the videos and that all videos were allowed to remain posted on YouTube. Therefore Mr. Myers is now being charged with crimes for videos that a Judge has already found did not violate the injunction against harassment, and which a Judge has already ordered to remain on YouTube.

