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7 IN THE SUPERIOR COURT OF THE STATE OF ARIZONA

8 IN AND FOR THE COUNTY OF PIMA

9 THE STATE OF ARIZONA,

10 Plaintiff,

11 vs.

12 LANE JEFFERY MYERS,

13 Defendant(s).

CR20251060-001
CR20251454-001

**RESPONSE TO MOTION TO
MODIFY DEFENDANT'S
CONDITIONS OF PROBATION**

Hon. Brenden Griffin
DIVISION 01

15 Comes now the State of Arizona, by and through the Pima County Attorney,
16 LAURA CONOVER, and her Deputy, RACHEL STILES, and moves this Honorable
17 Court to deny the Defendant's Motion to Modify Conditions of Probation as requested by
18 the Defendant and respectfully requests the Court review his conditions of release as it
19 appears the Defendant is actively violating his conditions of probation.
20
21
22

1 **I. FACTS:**

2 The Defendant was charged with offenses in CR20251060 after the Defendant
3 started a YouTube campaign against the victim due to her spouse's employment as a
4 Tucson City Prosecutor. The victim obtained an injunction against harassment against the
5 Defendant, but he continued with his efforts at contact and with posting videos causing
6 others to contact the victim. The Defendant was charged in CR20251454 with additional
7 offenses committed while on release for CR20251060 by continually putting up videos
8 causing further communication with the victim.

9 The Defendant entered a plea agreement on June 9, 2025, in both cases. On July 1,
10 2025, the Defendant was placed on probation for two different offenses. In CR20251060,
11 pursuant to a plea agreement, the Defendant was found guilty of Stalking Distress/Fear, a
12 Class Five Felony, committed September 12, 2024-February 22, 2025. In CR20251454,
13 pursuant to a plea agreement, the Defendant was found guilty of Aggravated Harassment-
14 Court Order in Place, a Class Six Felony, committed on March 16, 2025. He was placed
15 on probation as to both matters for three years with conditions of probation he was required
16 to follow.

17 The Defendant was required to abide by the following terms while on probation:

- 18 1. Do not contact the victim or her family.
19 2. Do not go to the victim's home.
20 3. Do not go to the victim's place of employment, meaning the building
21 where she works or where she parks her car.
22 4. Do not encourage others to contact the victim, go to her home, or place
 of employment.
 5. Do not engage in activities that would be reasonably expected to cause
 others to harass or contact the victim or her family.

- 1 6. Remove all videos that mention the victim or her family or include
identifying information about them.
- 2 7. Allow probation full access to your YouTube Channel and any other
social media to determine whether you are abiding by the conditions.
- 3 8. Do not associate or communicate, directly or indirectly with:
 - 4 a. Joshua Gray, New Smyrna Beach, FL. (YouTube Handle :This is a
Public Service.”)
 - 5 b. Mark Kelly, Tucson, AZ. (YouTube Handle “Reluctant Profit.”)
- 6 9. Do not post information about the victim, her husband or her minor
children on YouTube or other social media.

7 Furthermore, the victim was granted a Lifetime No-Contact Injunction against the
8 Defendant.

9 The Defendant, while he appeared to follow his probation terms for a period of time,
10 is now actively violating his conditions of probation and any modification of his probation
11 should be for enhancement of his probation conditions or revocation.

12 **II. LAW AND ARGUMENT**

13 Rule 27.1(b) of the Arizona Rules of Criminal Procedure provides “[t]he sentencing
14 court may impose conditions on a probationer that promote rehabilitation and protect any
15 victim.” It further states “[t]he probation officer also may impose regulations that are
16 necessary to implement the court’s conditions and that are consistent with them.” Ariz. R.
17 Crim. P. 27.1(b).

18 Rule 27.3 of the Arizona Rules of Criminal Procedure provides for the modification
19 of conditions of probation. Under Rule 27.3(b)(2), “[a]t any time before the probationer’s
20 absolute discharge, a probationer, probation officer, the State, or any other person the court
21 designates, may ask the court to modify or clarify any condition or regulation.”
22

1 **A. DEFENDANT’S MOTION**

2 The Defendant seeks to have his probation conditions modified and specifically
3 focuses on four conditions:

- 4 5. Do not engage in activities that would be reasonably expected to cause others to
5 harass or contact the victim or her family.
6 6. Remove all videos that mention the victim or her family or include
7 identifying information about them.
8 8. Do not associate or communicate, directly or indirectly with:
9 a. Joshua Gray, New Smyrna Beach, FL. (YouTube Handle :This is a
Public Service.”)
10 b. Mark Kelly, Tucson, AZ. (YouTube Handle “Reluctant Profit.”)
11 9. Do not post information about the victim, her husband or her minor children
12 on YouTube or other social media.

13 The Defendant alleges that the probation conditions are overbroad and violated his rights
14 under the First Amendment.

15 In *State v. Smith*, 112 Ariz. 416 (1975), the Arizona Supreme Court stated:

16 Probation is a matter of legislative grace. It is a sentencing alternative which
17 a court may use in its sound judicial discretion when the rehabilitation of the
18 defendant can be accomplished with restrictive freedom rather than
19 imprisonment. The court can surround probation with restrictions and
20 requirements which a defendant must follow to retain his probationary status.

21 *Smith*, 112 Ariz. at 419. The “trial court must be given substantial latitude in such matters
22 in light of the uncertainty as to how rehabilitation is actually accomplished.” *State v.*
Donovan, 116 Ariz. 209, 212 (App. 1977). In *State v. Kessler*, 199 Ariz. 83 (App. 2000),
the Court of Appeals found that ““Courts have consistently upheld imposition of conditions
of probation that restrict a defendant’s freedom of speech and association when those
conditions bear a reasonable relationship to the goals of probation.”” *Kessler*, 199 Ariz. at
¶ 21 (citations omitted). “A court will not ‘strike down conditions of release, even if they

1 implicate fundamental rights, if such conditions are reasonably related to the ends of
2 rehabilitation and protection of the public from recidivism.” *Id.* (quoting *United States v.*
3 *Schave*, 186 F.3d 830, 843 (7th Cir. 1999)).

4 **1. CONDITION 5**

5 Do not engage in activities that would be reasonably expected to cause others to
6 harass or contact the victim or her family.

7 This condition of probation is directly linked to the conduct for which the Defendant
8 was charged and convicted and is an essential part of his rehabilitation. The Defendant
9 utilized his YouTube account to publicly harass the victim. He provided information to
10 other YouTubers who then put the information on their sites as well to continue the
11 harassment against the victim. It is clear this condition of probation was imposed to stop
12 the Defendant’s harassment of the victim, to not utilize other people to harass the victim,
13 and to stop the Defendant from trying to find ways to continue to harass the victim.

14 It is notable that now that the Defendant has decided to challenge the conviction, he
15 is progressively engaging in more behavior that causes others to harass the victim and her
16 family. This has included posting additional YouTube videos regarding these cases and
17 providing disclosure to other YouTubers. This has again resulted in emails being sent to
18 the victim, her spouse, and undersigned counsel.¹ *See* Attachments A, D.

19 **2. CONDITION 6**

20 Remove all videos that mention the victim or her family or include
21 identifying information about them.

22 ¹ The attached email includes a link to Joshua Gray’s YouTube page, “This is a Public Service”, where he posted a
Rule 15 recording recently provided to the Defendant on May 26, 2026. This shows the Defendant is
communicating with Mr. Gray in violation of his probation terms and is using a third party to cause communication
with the victim.

1 This condition is also directly linked to the conduct for which the Defendant was
2 charged and convicted and is necessary to protect the victim. The Defendant posted
3 information about the victim and her family, including a photo of her family which led to
4 harassing communications with the victim. This condition is necessary to ensure the
5 Defendant and the Defendant's audience are not contacting and harassing the victim.
6

7 **3. CONDITION 8**

8 Do not associate or communicate, directly or indirectly with:

- 9 a. Joshua Gray, New Smyrna Beach, FL. (YouTube Handle :This is a Public
10 Service.")
11 b. Mark Kelly, Tucson, AZ. (YouTube Handle "Reluctant Profit.")

12 This condition is also directly linked to the conduct of the Defendant that led to his
13 conviction and is necessary to rehabilitate the Defendant and to protect the victim. The
14 Defendant was using his fellow YouTube personalities to reach a larger audience causing
15 more people to contact and harass the victim.

16 The importance of this is demonstrated by the fact that Joshua Gray posted the Rule
17 15 interview of the victim's husband in this case on his YouTube page. That interview
18 was recently provided to the Defendant on May 26, 2026. *See* State's Attachment B. Mr.
19 Gray has been now posting regarding the Defendant's case, including things regarding the
20 victim and her husband. This has led to contact with the victim, as demonstrated in State's
21 Attachment A.

22 **4. CONDITION 9**

Do not post information about the victim, her husband or her minor children on
YouTube or other social media.

1 This condition of probation is necessary to protect the victim in this case. The
2 Defendant posting information about the victim and her family has triggered harassment
3 of the victim. Through his social media postings, the Defendant created an environment
4 where any mention of the victim or her family triggers ongoing harassment of the victim
5 regardless of whether now he mentions her name.

6 **B. DEFENDANT'S CURRENT PERFORMANCE ON PROBATION**

7 The Defendant's conditions of probation were structured to rehabilitate the
8 Defendant while also protecting the victim. The Defendant has filed to modify his
9 conditions of probation, which is his right, but in the meantime, it appears he has decided
10 to not follow the conditions of probation for which he does not agree.

11 The Defendant has recently been posting on social media regarding his case utilizing
12 the same account he used that caused the harassment of the victim in this case. His
13 followers, who were there during the time the Defendant was posting about the victim, are
14 still familiar with what he is addressing even when he does not name the victim in this case.
15 This has led to the victim again getting harassing communication. *See* State's Attachment
16 A and D.

17 Furthermore, the Defendant requested a copy of his Rule 15 interviews in this case.
18 The State provided the Defendant with the copy as required. *See* State's Attachment B.
19 Joshua Gray, with whom the Defendant is prohibited from communicating, posted the
20 interview of the victim's husband.² Another YouTuber posted the interview of the
21 detective. *See* State's Attachment C. The actions of the Defendant in distributing the Rule

22 _____
² <https://www.youtube.com/watch?v=eN4NN3oXZmk>

1 15 interviews to other YouTubers have caused additional communication from the public
2 to be made to the victim in this case.

3 **III. CONCLUSION:**

4 The Defendant's request to modify the terms of his probation in this case as he
5 requested should be denied. The conditions of his probation are designed to rehabilitate
6 him and protect the victim. The Defendant initially was complying with the terms, and the
7 victim was not subject to ongoing harassment. Now that the Defendant is not following
8 the conditions of his probation and is back to posting on YouTube and providing content
9 regarding the case to other YouTubers, the victim is again being subjected to
10 communications from the public of a negative nature. *See* State's Attachment D. This
11 demonstrates how the conditions of probation were necessary and achieved some of the
12 goals of probation. The Defendant's disregard of his probation terms is now subjecting the
13 victim to harm and serving to cause the Defendant to go further down a path that will be
14 harmful to himself and to the community. For these reasons, the State is also seeking to
15 modify the Defendant's conditions of probation as he is currently violating the conditions,
16 and it is questionable whether the Defendant remains a good candidate for probation.

17
18 Respectfully submitted this 24th day of June, 2026.

19 LAURA CONOVER
20 PIMA COUNTY ATTORNEY

21 /s/ Rachel L. Stiles
22 Rachel L. Stiles, Deputy County Attorney

1 **Original of the foregoing filed**
2 **with the Pima County Superior Court**
3 **this 24th day of June, 2026.**

4 **Copy of the foregoing emailed/delivered**
5 **this 24th day of June, 2026, to:**

6 Honorable Brenden Griffin
7 Division 01
8 Pima County Superior Court

9 Lane Myers
10 Defendant

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ATTACHMENT A

Rachel Stiles

From: stackundertow <stackundertow@proton.me>
Sent: Saturday, June 20, 2026 10:40 PM
To: [REDACTED]; Rachel Stiles
Subject: CUNT WHORE

HEY MATT AKA CUNT WHORE DID YOU SEE THIS? HEY CUNT WHORES AKA SHANON AND RACHAEL DID YOU SEE THIS? LOL LANE ALWAYS WINS

<https://www.youtube.com/watch?v=zzizk1KWNXw>

Sent with Proton Mail secure email.

CAUTION: This message and sender come from outside Pima County Attorney. If you did not expect this message, proceed with caution. Verify the sender's identity before performing any action, such as clicking on a link or opening an attachment.


ATTACHMENT B

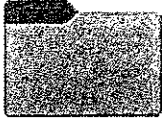
Rachel Stiles

From: SharePoint Online <no-reply@sharepointonline.com>
Sent: Tuesday, May 26, 2026 5:00 PM
To: Rachel Stiles
Subject: lanesbackupacct@gmail.com successfully used the link to "Myers Rule 15s"

lanesbackupacct@gmail.com has opened the link to "Myers Rule 15s" that you sent to them!

If this is unexpected, you can [manage your folder's sharing permissions](#).

 This link only works for the direct recipients of this message.



Myers Rule 15s

Open

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ATTACHMENT C

Lane Myers Pre trial interview of Tucson police Det Eric Brown !!



Illuminate The Dark
63 subscribers



Share



Save



20 views 3 days ago

The Walker Saga continues with another interview by Lane Myers of Det Eric Brown of the Tucson Police Department.

I'm going to expose all the ironic hypocrisy that's going on down there ...more

3 Comments Sort by



Add a comment...



@ThisisAPublicService 3 days ago
HOLY



Reply



@ThisisAPublicService 32 minutes ago
Back in business!!



Reply

Hide replies



@SmileeTraveler 3 days ago
Detective doo doo brown



Reply

Top is selected, so you'll see featured comments

ATTACHMENT D



Outlook

[EXT] Liars Pay Up

From paythatmanhismoney <paythatmanhismoney@proton.me>

Date Tue 6/9/2026 10:52 AM

To [REDACTED]

External Email

Hey Stupid Bitch. Did you think you got away with your lies? Get ready to lose everything you own to Lane Myers. Hope your ready for war.

Sent with [Proton Mail](#) secure email.



Outlook

[EXT] SHANNON YOUR HUSBAND

From anontakeshistime <anontakeshistime@proton.me>

Date Sat 6/20/2026 8:45 PM

To [REDACTED]

External Email

SHANNON YOUR HUSBAND SOUNDS LIKE A LITTLE BITCH LOL LANE DESTROYED HIM AGAIN HA HA HA HA HAA HA

Sent with [Proton Mail](#) secure email.
