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6 Attorney for the State

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

**STATE'S PETITION TO  
REVOKE DEFENDANT'S  
PROBATION**

Hon. D. Douglas Metcalf  
DIVISION 16

15 Comes now the State of Arizona, by and through the Pima County Attorney,  
16 LAURA CONOVER, and her Deputy, RACHEL STILES, pursuant to Rule 27.6 of the  
17 Arizona Rules of Criminal Procedure, hereby Petitions this Court to Revoke the  
18 Defendant's Probation. The State supplements the petition filed by the Adult Probation  
19 Department on July 8, 2026.  
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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, through February 22, 2025. In  
13 CR20251454, pursuant to a plea agreement, the Defendant was found guilty of Aggravated  
14 Harassment-Court Order in Place, a Class Six Felony, committed on March 16, 2025. He  
15 was placed on probation as to both matters for three years with conditions of probation he  
16 was required to follow.

17           The Defendant was required to abide by the following terms while on probation that  
18 were ordered by the Court and encompassed under Condition 15 in his Conditions of  
19 Probation Document:

- 20           1. Do not contact the victim or her family.  
21           2. Do not go to the victim's home.  
22           3. Do not go to the victim's place of employment, meaning the building  
              where she works or where she parks her car.

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

9 Furthermore, the victim was granted a Lifetime No-Contact Injunction against the  
10 Defendant.

11 The Adult Probation Department filed a Petition to Revoke the Defendant’s  
12 Probation on July 9, 2026, with the allegation that “On or about June 14, 2026, through  
13 July 3, 2026, the defendant posted information about the victim and her husband on  
14 YouTube. (Condition 15).”

## 15 **II. ALLEGED VIOLATIONS OF PROBATION**

16 Rule 27.6 of the Arizona Rules of Criminal Procedure provides that “the probation  
17 officer or the State may petition the court to revoke probation if there is reasonable cause  
18 to believe that a probationer has violated a written condition or regulation of probation.”  
19 The probation department has filed a Petition for alleged violation of one condition of  
20 probation contained within Condition 15. The State hereby alleges there is reasonable  
21 cause to believe the probationer has violated the following conditions as ordered by the  
22 Court and encompassed in Condition 15:

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

10 **III. CONCLUSION**

11 The State requests, pursuant to A.R.S. § 13-901(C) and Arizona Rule of Criminal  
12 Procedure 27.6, that the Court revoke the Defendant’s probation because there is  
13 reasonable cause to believe he has violated the conditions of his probation.

14 Respectfully submitted this 10th day of July, 2026.

15 LAURA CONOVER  
16 PIMA COUNTY ATTORNEY

17 /s/ Rachel L. Stiles  
18 Rachel L. Stiles  
19 Deputy County Attorney

20 **Original of the foregoing filed**  
21 **with the Pima County Superior Court**  
22 **this 10th day of July, 2026.**

**Copy of the foregoing emailed/delivered**  
**this 10th day of July, 2026, to:**

Honorable D. Douglas Metcalf  
Division 16  
Pima County Superior Court

1 Mark Resnick  
Advisory Counsel for Defendant

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3 Lane Myers  
Defendant

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