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APR 25 2016	
CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY _____

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Plaintiffs in pro per

UNITED STATES DISTRICT COURT  
DISTRICT OF ARIZONA

Janis Kaighn, Gregory R. Kaighn

Plaintiffs,

vs.

United States of America, State of  
Arizona, City of Prescott, Yavapai  
County, Prescott City Court, Sheila Polk,  
Yavapai County Attorney in her official  
capacity, Jon Paladini, Prescott City  
Attorney in his official capacity, Glenn  
Savona, Prescott Deputy City Attorney in  
his official capacity, Andy Reinhardt,  
City of Prescott Deputy Police Chief in  
his official capacity,

Defendants.

CASE NO: CV-16-08079-PCT-SPL

PLAINTIFFS MOTION SEEKING  
THE ISSUANCE OF ARREST  
WARRANTS

(Federal Rules of Criminal Procedure 3  
and 4)

Plaintiffs Janis Kaighn and Gregory R. Kaighn hereby request the issuance of arrest warrants pursuant to Federal Rules of Criminal Procedure 3 and 4. This Request is based on the Verified Complaint and other pleadings filed in this action.

Rule 3 defines a 'complaint' to be a written statement of the essential facts constituting the offense charged. The complaint must be made under oath and before a magistrate judge. A district judge also had the same powers as a magistrate judge in this respect. The verification of plaintiffs' pleadings satisfies this requirement.

Rule 4 specifically contemplates the filing of criminal complaints by non U.S. Attorney's. The statute draws a clear distinction between filings made by 'an attorney for the government' and filings made by 'anyone else.' The Federal Rules of Criminal

1 Procedure contemplate the exact situation that exists in this case.

2 Plaintiffs do not know or know very much about Mr. Leonardo, the U.S. Attorney  
3 for the District of Arizona. We have not researched the judicial history of Judge  
4 Leonardo while serving in Pima County. Plaintiffs years of experience with this case  
5 leads to the clear conclusion that Mr. Leonardo is unable to act on his own. Mr. Leonardo  
6 is constrained by the combination of "local politics" and "national politics."

7 Plaintiffs therefore file this criminal complaint themselves. Rule 4 states "If the  
8 complaint or one or more affidavits filed with the complaint establish probable cause to  
9 believe that an offense has been committed and that the defendant committed it, the judge  
10 must issue an arrest warrant to an officer authorized to execute it."

11 The Verified Complaint and other pleadings clearly establish probable cause to  
12 arrest many people. The Federal criminal investigation into the conduct of former  
13 Maricopa County Attorney Andrew Thomas and Maricopa County Sheriff Joe Arpaio has  
14 been pending for some time. Exhibit 5 to the Verified Complaint very clearly establishes  
15 the elements of criminal racketeering as defined in the RICO Statutes, 18 U.S.C. § 1961  
16 et. seq. In fact, most of the evidence has been assimilated by others and is in the public  
17 domain. Plaintiffs are simply "connecting the dots."

18 Andrew Thomas was disbarred over these facts, and Sheriff Joe Arpaio has almost  
19 no chance at an acquittal. Both Andrew Thomas and Joe Arpaio stand to spend the rest of  
20 their lives in prison based on the facts contained in the record of this case. Nearly all of  
21 the facts are alleged in the Verified Complaint are beyond dispute. All of nearly all of  
22 Exhibit 5 is beyond any factual dispute. This Court can and should consider hearsay in  
23 issuing the warrants plaintiffs request.

24 This outrageous conspiracy is certainly larger than Andrew Thomas and Joe  
25 Arpaio. That said, Thomas and Arpaio are the two most dangerous criminals in the State  
26 of Arizona. Both are a threat to the public safety of any citizen that disagrees with either  
27 person. Both are a threat to the public safety of Arizonans in general.

28 Sheriff Arpaio has been the most powerful politician in the State of Arizona for

1 many years. He has more power as the Maricopa County Sheriff than does the Governor  
2 of Arizona. Sheriff Arpaio is also the "lightening rod" that gave cover to Andrew  
3 Thomas and still gives cover to law enforcement personnel throughout the State of  
4 Arizona. Similarly, local prosecutors are still 'beholden to the Cabal.'

5 This is the rare situation in which the arrest of two individuals in a much larger  
6 conspiracy can make a huge difference in terms of public safety. Thomas and Arpaio are  
7 so well known that no one dares challenge either . . . until they are both arrested. In terms  
8 of the physical safety of the people of the State of Arizona, these two arrests will stop  
9 other Arizona law enforcement agencies from continuing this sort of conduct. The  
10 evidence is overwhelming, this is as "easy" a RICO prosecution as one could possibly  
11 ever find, and there is virtually no chance of an acquittal. Andrew Thomas and Joe  
12 Arpaio need to be arrested immediately and held without bail. The murder of Supreme  
13 Court Justice Antonin Scalia should be 'the last straw' for everyone.

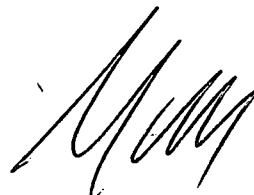
14 The City of Prescott and Yavapai County law enforcement officials and  
15 government lawyers involved in the pursuit of this political vendetta must be arrested. 18  
16 U.S.C. 241 and 242 are the criminal statutes that apply to the obvious conspiracy to  
17 interfere with plaintiffs civil rights and to do so under color of law and by way of  
18 conspiracy. The list of 'defendants' includes the entire City Council, the City Manager,  
19 the County Board of Supervisors, and others in addition to the named defendants in this  
20 case.

21 Plaintiffs hereby request the issuance of these arrests warrants pursuant to the  
22 above legal authorities.

23 Respectfully submitted,

24 Dated: April 25, 2016

25 By



26 Gregory R. Kaighn  
27 Janis Kaighn



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