

# Horne Slaton, PLLC

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## NOTICE OF CLAIM AGAINST THE STATE OF ARIZONA

From: Timothy Jeffries

To: Arizona Attorney General's Office  
1275 West Washington Street  
Phoenix, AZ 85007

This is a Notice of Claim by **TIMOTHY JEFFRIES** against, the State of Arizona.

On Friday, July 7, the State of Arizona published a report containing libel against Jeffries. This report contained important statements which were false, and known to be false by the State's employees. For which it is responsible. There were also malicious motives involved in the writing and the publication of the report. The report was published to the public and caused considerable damage to Timothy Jeffries in his profession.

Jeffries is in the consulting business, and his success depends on his reputation. The publication of this report was considerably damaging to his reputation, and therefore to his livelihood.

The report stated that that Jeffries carried a gun on state property. That was false.

The report stated that Jeffries wanted to arm every DES employee. That was false.

The report stated that Jeffries wanted to create his own police force and control it. That was false.

The report stated that Jeffries was involved in ammunition planning, procurement and storage. That was false.

The report stated that Jeffries regularly took ammunition from the DES inventory. That was false.

The report stated Jeffries went to a gun range on a weekly basis. That was false.

The report stated Jeffries would leave work early to go to a gun range. That was false.

The report stated Jeffries openly proclaimed to be going to the shooting range to shoot DES inventory. That was false.


There were other false statements in the report. The author of the report and witnesses quoted in the report or cited in the report and other State employees, knew that the statements were false, and acted with malice.

The state of Arizona is responsible for the actions described above.

We are prepared to settle this matter for \$5.1 million.

**HORNE SLATON, PLLC**

Sincerely,



Thomas C. Horne, Esq.  
*Attorney for Timothy Jeffries*

TCH/dcs