

COMPLAINT AGAINST A LAWYER

Return your completed form to:

Alabama State Bar
Disciplinary Commission
P. O. Box 671
Montgomery, AL 36101-0671

NAME AND ADDRESS OF COMPLAINANT

Larrabee, J. Whitfield

Last Name, First Name

251 Harvard Street, Suite 9

Address

jwlarrabee@verizon.net

E-mail Address

Brookline, MA 02446

City, State, ZIP Code

617-566-3670

Telephone Number(s)

none

Name & Relationship of Person Who Can Always Contact You

Telephone Number(s)

On what date did the alleged ethics violation occur?

What was your fee arrangement with the attorney?

NAME AND ADDRESS OF ATTORNEY AGAINST WHOM YOUR COMPLAINT IS MADE

Moore, Roy Stewart

Last Name, First Name

Name of Law Firm Where Attorney is Employed

1185 Tumlin Gap Road

Address

Gallant, AL 35972

City, State, ZIP Code

(256) 570-0725

Telephone Number(s)

Various Dates In November 2017, other

Not Applicable

COMPLAINT INSTRUCTIONS:

1. If you have a complaint against more than one attorney, use a SEPARATE complaint form for each attorney, with the details and relevant exhibits attached to each separate complaint. If you are filing more than one complaint, do not combine your complaint details or your exhibits into one document, or make a specific comment about a complaint filed against another attorney, or it will be returned to you. We will not accept complaints against law firms.
2. Send your complaint with an original notarized signature. We will not accept a copy of your signature.
3. State specifically, on each individual complaint, what the attorney did or failed to do which you believe constitutes unethical conduct, and when it occurred.
4. Attach **COPIES** of any receipts, contracts, or other documents which are important to the complaint, to the back of each individual complaint. Keep your own original documents.
5. Please, do not bind your complaint. Type or write your complaint legibly in ink so it can be copied.
6. You may add more pages to this form if necessary.
7. If you believe that drugs, alcohol or mental disability affected the lawyer's representation, please state what facts support your belief.
8. This matter is confidential at this stage of the proceedings, until the Disciplinary Commission or Board has acted.

9. The Alabama Bar Association does not represent you in this matter but acts to investigate complaints on behalf of the Supreme Court of Alabama.

If there is a court case related to your complaint, please provide the case name and file number, and the lawyer representing you?

DETAILS OF YOUR COMPLAINT

Explain your complaint in your own words. Include the following: all important dates, times, places, and court file numbers. Please be advised we cannot return documents submitted to this office. You should retain a copy of all materials you submit. Do not send cassette tapes unless requested by the Bar to do so. The Alabama State Bar cannot be held responsible for lost, misdirected or damaged documents.

The attorney has engaged in the following misconduct:

1. Numerous instances of sexual assault.
2. Witness intimidation. November 2017
3. Threats to file baseless litigation. November 2017
4. Notorious and public lying to cover-up sex crimes & misconduct.
5. Disregarding a federal injunction.
6. Interference with legal process.
7. Other activities that demonstrate dishonesty and unfitness to practice law.

SEE ATTACHED COMPLAINT FOR FURTHER DETAILS.

The attorney you are filing the complaint against will receive a copy of your complaint, and may be asked to respond to your allegations.

I hereby certify that the information I am providing is true and accurate to the best of my knowledge and that I will voluntarily appear and testify to the facts in the complaint if called upon by the Alabama State Bar.

J. W. [Signature]
Name (signature)

Date: Nov. 16, 2017

Sworn to and subscribed before me this 16th day of November, 2017.

[SEAL]



Bruce C. Kraft
NOTARY PUBLIC

MY COMMISSION EXPIRES: December 25, 2020

THE DISCIPLINARY COMMISSION OF THE ALABAMA STATE BAR

IN THE MATTER OF:
ROY STEWART MOORE

)
)
)
)

COMPLAINT

INTRODUCTION

1. This is a complaint against Roy Stewart Moore ("Moore"). It is based on information and belief, including reports in the Washington Post, AL.com and other reliable media outlets.
2. Moore is licensed to practice law in Alabama and is a lawyer subject to the disciplinary authority this jurisdiction. Moore has previously been disciplined for misconduct in the course of his activities as a judge.
3. During the course of his career as an attorney, prosecutor, and District Attorney, Moore has engaged in predatory sexual activity. This predatory sexual activity has included sexual activity with minors as young as 14, sexual assault, attempted rape, sexual harassment, and sexual abuse.
4. Moore initiated a sexual encounter with Leigh Corfman in 1979, when she was 14 and he was 32. Moore knowingly lied in November of 2017 when he falsely denied that he engaged in sexual activity with Corfman and when he claimed to have "never known" Corfman and "never had any contact with her".
5. December 1977 or January 1978 Moore imprisoned, sexually assaulted and attempted to rape Beverly Young Nelson. Moore intimidated Nelson at the time, telling her, "You're just a child, I'm the district attorney. If you tell anyone about this no one will ever believe you." Moore rejected Nelson's accusations. "I can tell you without hesitation, this is absolutely false," Moore said. "I never did what she said I did. I don't even know the

woman. I don't know anything about her." Moore's claims were lies. In fact, Moore came into Nelson's workplace and signed her yearbook in December 1977.

6. Also in 1977, Moore sexually harassed Gena Richardson by forcefully kissing her without her consent. Richardson was 18 years old at the time.
7. While he was in his 30s, Moore engaged in sexually predatory activity, including sexual harassment, in the Gadsen Mall in which he attempted to initiate sexual contact with minors/teenagers. Becky Gray complained to her employer that Moore was sexually harassing her by making unwanted sexual advances. As a result, Moore was banned from the Gadsen Mall.
8. In 1991, Moore sexually assaulted Tina Johnson. Johnson visited Moore (now married) in his law office for a legal matter. Moore engaged in unwanted sexual behavior and "grabbed" Johnson's buttocks as she left.
9. As of the date that this complaint was filed, there are at least 8 women who have made credible sexual assault, sexual harassment or sexual misconduct complaints against Moore. There are numerous other additional witnesses who provide corroboration of these allegations.
10. In November of 2017, acting through his attorney, Moore threatened to file suit against the Washington Post and the Alabama Media Group (al.com) for their truthful and accurate reporting about Moore's sexual misconduct. The reporting about these events by the media outlets was protected first amendment activity. The threatened suits were frivolous, insubstantial, wholly without merit and made in bad faith. If Moore files the suits, it will be an abuse of process and malicious prosecution. Moore's activities in this regard are akin to witness intimidation.

11. Moore's accusers are witnesses that have relevant testimony for the Senate Ethics Committee and the Senate Judiciary Committee if he is elected.
12. Moore has made statements, directly and through his attorney, with the purpose and effect of threatening and intimidating his accusers and other witnesses against him, including reporters and other individuals in the news media.
13. On September 30, 2016, Moore was found guilty of six charges involving judicial misconduct and was suspended for the remainder of his term, slated to end in 2019.
14. The charges included: disregarding a federal injunction, demonstrated unwillingness to follow clear law, abuse of administrative authority, substituting his judgment for the judgement of the entire Alabama Supreme Court, including failure to abstain from public comment about a pending proceeding in his own court, and, interference with legal process and remedies in the United States District Court and/or Alabama Supreme Court related to proceedings in which Alabama probate judges were involved.

COUNT 1

VIOLATION OF RULE 8.4(b) BY COMMITTING CRIMINAL ACTS

15. The allegations in the preceding paragraphs are incorporated by reference as if fully set forth.
16. Moore violated Rule 8.4(b) of the Alabama Rules of Professional Conduct by engaging in criminal conduct that reflects "adversely on the lawyer's honesty, trustworthiness or fitness as a lawyer in other respects.

COUNT 2

VIOLATION OF RULE 8.4(c) BY CONDUCT INVOLVING
DISHONESTY, FRAUD, DECEIT OR MISREPRESENTATION

17. The allegations in the preceding paragraphs are incorporated by reference as if fully set forth.
18. Moore engaged in conduct involving dishonesty, fraud, deceit or misrepresentation in violation of Rule 8.4(c) of the Alabama Rules of Professional Conduct.

COUNT 3

VIOLATION OF RULE 8.4(d) BY ENGAGING IN CONDUCT THAT
PREJUDICIAL TO THE ADMINISTRATION OF JUSTICE

19. The allegations in the preceding paragraphs are incorporated by reference as if fully set forth.
20. Roy violated and continues to violate Rule 8.4(d) of the Alabama Rules of Professional Conduct by engaging "in conduct that is prejudicial to the administration of justice."

WHEREFORE, the complainant respectfully requests the Disciplinary Commission of the Alabama State Bar to fully investigate the facts and violations described in this complaint and that it duly, expeditiously and properly enforce the Alabama Rules of Professional Conduct.

Respectfully submitted,



J. Whitfield Larrabee
Law Offices of J. Whitfield Larrabee
251 Harvard Street, Suite 9
Brookline, MA 02446
(617) 566-3670