



# National Coalition For Men (NCFM)

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January 28, 2021

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California State Bar  
Office of Chief Trial Counsel Intake  
845 South Figueroa Street  
Los Angeles, CA 90017

Re: Request for State Bar Investigation  
Violations of the California State Bar Professional Rules of Conduct  
Potential Violations of State & Federal Criminal Law Statutes

Rule 1.2.1(a) Advising or Assisting the Violation of Law

Rule 3.3(a)(1)(2)(3)(b) – Candor Towards the Tribunal

Rule 8.4 et seq – Misconduct (Fraud, Perjury)

Violation of California Penal Code § 118(a) - Perjury

Violation of California Penal Code § 118a – Perjury (Affidavit)

Violation of Title 18 U.S. Code § 1343 – Wire Fraud

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Committed to ending harmful gender-based stereotypes

On July 13, 2020, a 66-page Brief was electronically signed and filed in the Court of Appeal, Fifth Appellate Division, case No. F079240, in the matter of Plaintiff & Appellate Jerry Cox v. Ashley Harris, Defendant & Respondent, arising out of Mariposa County Superior Court case # 11149, by the Law Firm of Jones Day and the Family Violence Appellate Project.

That public record Brief, filled with inconsistencies, exaggerations, false information, and multiple examples of perjury has been included in this complaint package for reference.

Attorney Erna Mamikonyan of the law firm of Jones Day, representing Defendant & Respondent Ashley Harris, electronically signed and filed the Brief which also listed attorneys Erica L. Reilley and Melissa Adams of Jones Day.

Attorneys Shuray Ghorishi, Arati Vasan, Jennafer Dorfman Wagner, and Erin C. Smith of the Family Violence Appellate Project, are also listed as representing Defendant Ashley Harris, however it is not known by this organization if they filed a separate Brief.

This case came about when Harris falsely accused Mr. Cox of rape in November of 2015 in Mariposa County. Mr. Cox was quickly arrested, despite readily available and undisputed forensic electronic evidence that unequivocally proved that Harris lied to law enforcement authorities about being sexually assaulted.

As a result of the criminal actions of Harris and a group of apparently corrupt public officials and attorneys working with or for Mariposa County, Mr. Cox has been rendered homeless, penniless, and on food stamps. His bail was elevated and he paid \$50,000 to a bondsman, spent well over \$100,000 for legal representation, was prohibited from living on his 400+ acre ranch, had to sell all of his personal property, and his ranch, including all of his improvements were ostensibly taken by a Kangaroo type court receivership process.

In August 2018, Mr. Cox filed a lawsuit against Harris in the Mariposa County Superior Court (Case #11149) for defamation, libel, malicious prosecution, and abuse of process. Mr. Cox's lawsuit was improperly dismissed, and he subsequently appealed. Later, Mr. Cox filed a federal Civil Rights and RICO lawsuit, which is pending.

The Brief filed on behalf of Harris reveals that her attorneys made factual misrepresentations, which appear to be intentional, despite a plethora of evidence showing Harris committed criminal acts in at least four California counties, including a false sexual assault allegation against Mr. Cox, which is the basis of this complaint.



Official court records have proven that Harris has repeatedly lied and lied about being sexually assaulted by Mr. Cox. Official transcripts prove that she perjured herself in a worker's compensation deposition. And, last year, a Superior Court Judge in San Luis Obispo County ruled Harris "was not credible." All readily available to anyone researching Harris or Mr. Cox.

This complaint and Harris's Brief demonstrate that her attorneys knew or should have known about her history of false claims and criminal acts, including filing a false police report and perjury. If true, it appears the attorney's committed an intrinsic fraud upon the court and may be in violation of numerous state and federal criminal law statutes, including Wire Fraud.

## **ABSTRACT**

False accusers of domestic violence, sexual assault, rape, child abuse and other crimes misuse family courts, law enforcement, prosecutors, victim advocates, and other support services to control, intimidate and intentionally inflict pain and suffering upon those they falsely accuse, including their immediate and extended families, involved friends and associates.

Moreover, all victims including illegitimate ones are provided medical care, Victim Compensation Fund reimbursements, relocation assistance, housing assistance and even tens of thousands of dollars in direct financial assistance. Aside from which, female false accusers often get free legal representation, like Harris, even after her litigious lies were exposed and are a matter of public record.

In contrast, those falsely accused like Mr. Cox, a once thriving business owner and rancher is homeless, penniless, and on food stamps.

A false social and political narrative exists that women do not lie about being raped or abused. However, false allegations are routine and so common that in family law they are referred to as the *Silver Bullet*.

Either the attorneys named in this complaint are grossly incompetent or appear to be committing an intrinsic fraud upon the court, perhaps warranting a lengthy suspension or even disbarment, pursuant to California Business and Professions Code section 6106. Additionally, criminal referrals to appropriate prosecutorial agencies may be warranted.



## **The National Coalition For Men**

The National Coalition for Men (NCFM) is a 501(c)(3) educational nonprofit corporation established in 1977 and is the nation's oldest men's human rights organization. Our directors, advisors, liaisons, and members are men *and* women from a wide variety of professions across the globe, including, educators, medical professionals, psychologists, attorneys, veterans, and former and retired state and federal law enforcement officers.

NCFM is committed to the removal of gender-based stereotypes, especially as they adversely impact boys, men, their families, and the women who love them, including but not limited to, issues involving the criminal justice, and family court systems.

You can learn more about NCFM, our interests, activities, and numerous accomplishments by visiting our website, [www.ncfm.org](http://www.ncfm.org).

## **Background**

Since 2017, NCFM has been involved in an ongoing inquiry and has conducted advocacy efforts on behalf of Mr. Cox. This inquiry has resulted in the discovery of multiple examples of corruption and misconduct involving public officials, judicial officers, prosecutors, attorneys, and law enforcement officers.

Until recently, Mr. Cox was the owner of a 437-acre ranch located in Mariposa County called The Bison Creek Ranch. Mr. Cox unlawfully had his property seized by public officials in Mariposa County with the assistance of the Law Firm of Silver & Wright, and a Receiver and Attorney, Mr. Mark Adams of the California Receivership Group located in Santa Monica.

NCFM is under the belief that the Law Firm of Silver & Wright has been the defendant in at least one successful civil action against their firm due to their unscrupulous practices, and that attorney and Receiver Mark Adams has been the subject of numerous State Bar complaints and has been sanctioned by at least one Superior Court judge in Los Angeles County for his unethical business practices.

This scenario began in November of 2015 when Mr. Cox began a dating relationship with Ms. Harris, whom he met on an online dating website. Initially, the relationship was a normal male-female relationship that developed into an intimate relationship.



A short time later, Harris filed a report with the Mariposa County Sheriff's Department that Cox had held her captive in his ranch cabin and raped her. Sheriff's Department investigators swiftly moved to arrest Mr. Cox and obtained search warrants for his person and home.

Mr. Cox was soon charged with more than 15 felonies by Deputy District Attorney Regina Florick; however, all criminal charges were dismissed by District Attorney Thomas Cooke, some twenty (20) months later due to a vigorous effort by Mr. Cox's criminal defense team.

The criminal charges against Mr. Cox were dismissed by DA Thomas Cooke on August 14, 2017, when he was informed by Cox's defense team that Harris committed perjury in a worker's compensation deposition in Marin County, where she claimed, under oath, that she had never been sexual assaulted. Cooke later admitted that Harris 'LIED' at a public campaign event which was captured on video and is readily available on the Internet.

Additionally, irrefutable exculpatory electronic evidence was in the possession of Mariposa County sheriff's investigators within the first 2-3 hours of their investigation, which they intentionally ignored. They arrested and subsequently charged Mr. Cox without sufficient probable cause or evidence, and as the cash languished, vigorously delayed discovery attempts by Mr. Cox's criminal defense team for months, allowing some evidence to 'spoil.'

Furthermore, audio recordings of sheriff's department investigator's interviews with Harris revealed they were fully aware of exculpatory electronic evidence, yet they ignored it and proceeded to arrest Mr. Cox and violate his due process and constitutional rights under color of law.

The combined civil rights violations, frauds, and criminal acts by public officials in Mariposa County have resulted in a Federal Civil Rights and RICO lawsuit which has been filed in the United States District Court, Eastern District of California, Fresno Division, Case 1:19-cv-01105-AWI-BAM, on August 12, 2019.

During this saga, which is now in its fifth year, Mr. Cox filed a civil suit against Harris, and unnamed co-defendants for her false allegations on August 22, 2018, in the Mariposa County Superior Court, case # 11149, for defamation, libel, malicious prosecution, and abuse of process. Mr. Cox's lawsuit was improperly dismissed, and he subsequently appealed.



### **Violation #1 - Rule 3.3(a)(1)(2)(3)(b) – Candor Towards the Tribunal**

In their 66-page filing, the attorneys are in violation of this section, where they falsely claimed that Mr. Mr. Cox raped Harris, specifically on page 12 of their filing with the following statement.

*“Ashley returned on November 11, 2015 at approximately 7:30 p.m. (CT 9; CTO 142, 165.) This is when the abuse commenced and lasted until the morning of November 13, 2015, during which time Cox brutally raped and assaulted Ashley and threatened her life. (CT 9-10; CTO 136-137, 142-143, 168.)”*

### **Violation #2 - Rule 3.3(a)(1)(2)(3)(b) – Candor Towards the Tribunal**

In this same filing on page 17, they made the following false statement.

*“On the morning of November 13, 2015, Cox physically and sexually assaulted Ashley again...”*

### **Violation #3 - Rule 3.3(a)(1)(2)(3)(b) – Candor Towards the Tribunal**

On page 18, they made the following false statement.

*“Law Enforcement Conducts an Extensive Two-Year Investigation and Files Criminal Charges Against Cox.”*

This is a grossly misleading and false statement. The attorneys named in this complaint are intentionally attempting to deceive the appellate court by intimating that the Mariposa County Sheriff’s Department conducted a two-year investigation BEFORE they arrested and charged Mr. Cox.

The truth as evidenced by official reports in the criminal investigation is that the Mariposa County Sheriff’s Department conducted a FIVE HOUR investigation before they arrested Mr. Cox.

The truth as evidenced by official reports in the criminal investigation is that Mariposa County Deputy District Attorney Regina Florick filed nearly 20 felony charges and enhancements within THREE-DAYS after they arrested Mr. Cox, even when they knew and were in possession of exculpatory electronic evidence of Mr. Cox’s innocence, that was contained on Harris’ cell phone.

The truth as evidenced by official reports in the criminal investigation is that Mariposa County Deputy District Attorney Regina Florick vigorously fought Mr. Cox's criminal defense attorneys attempts at discovery of the contents of Ashley's Harris' cell phone for approximately 1 ½ years.

DDA Florick's actions; the almost immediate filing of multiple felony crimes of Mr. Cox, without sufficient probable cause is a violation of California State Bar Professional Rules of Conduct, Rule 3.8. Special Responsibilities of a Prosecutor, and may also be a violation of, Title 18 U.S. Code § 242 - Deprivation of Rights Under Color of Law.

The truth as evidenced by official reports in the criminal investigation is that Mr. Cox's criminal defense attorneys had to file a second supplemental Motion to Dismiss due to destruction or loss of evidence in April of 2017. Harris cell phone which contained exculpatory evidence was one of the primary issues raised in that motion.

#### **Violation #4 - Rule 3.3(a)(1)(2)(3)(b) – Candor Towards the Tribunal**

In this same filing on page 24, the attorneys named in this complaint made the following statement.

*“Cox Submits Evidence That Grossly Distorts the Parties' Relationship and the Timeline of Relevant Events.”*

The truth as evidenced by official reports in this case is that the attorneys named in this complaint have grossly distorted the nature of the relationship between Mr. Cox and Harris. They have grossly distorted the facts and evidence of this case and the timeline of events in an intentional attempt to commit an intrinsic fraud upon the court, to falsely portray Harris as a sexual assault victim at the hands of Cox.

As the layers of the onion get pulled back after time and significant effort, the truth however is the fact that Harris is a serial liar, false accuser, grifter and professional scam artist, who uses false allegations, and the civil and criminal court systems, as well as other services and programs for personal financial enrichment.

Additional potential violations include but are not limited to the following.

**Rule 1.2.1(a) Advising or Assisting the Violation of Law**

**Rule 8.4 et seq – Misconduct (Fraud, Perjury)**

**California Penal Code § 118(a) - Perjury**

**California Penal Code § 118a – Perjury (Affidavit)**

**Title 18 U.S. Code § 1343 – Wire Fraud**



## CONCLUSION

The reality involving victims of sexual assault is the fact that victims are afforded virtually every conceivable resource available when they file a claim of sexual assault with law enforcement authorities, and NCFM is in full agreement when legitimate victims are identified.

In this case, Harris manufactured the events to an absurd level, yet was provided with the professional services of over a dozen law enforcement professionals who took some part in the investigation and forensic examination of her claims, a victim's advocate, a SART Nurse, a District Attorney and Deputy District Attorney who vigorously fought efforts for discovery, thereby preventing the truth from being learned.

Harris fraudulently petitioned for and received compensation from the California Crime Victims Compensation Fund and has been afforded countless hours of pro-bono legal counsel since she initiated her false claims.

It is estimated that the false claims and allegations of Harris have cost the taxpayers in excess of one million dollars in labor hours and resources.

While it can be said that there may be, in limited circumstances, the need for a law firm to provide some sort of legal representation to a victim of sexual assault, the truth is that law firms who offer and provide pro-bono legal services on behalf of sexual assault victims, do so, to prevent the lies of false accusers from being exposed in a court of law, when they are sued by those who they falsely accuse.

As such, in almost all cases, males who have been falsely accused of sexual misconduct have no resources to retain legal counsel, and the fabrications of their false accusers are never brought to light, nor are they ever sanctioned for their crimes and the devastation they have inflicted upon the victims they falsely accuse.

There exists a false political and social narrative that females never lie about being sexually assaulted. The truth however is much different in that false allegations of sexual assault by females is one of the leading falsely reported crimes in this country.

Hundreds of millions of federal and state taxpayer funds are doled out to various programs and municipalities every year. As such, those entities who receive such funds have a financial incentive to manipulate, distort, and contort the facts and evidence of the prevalence of sexual assault, and in the case of Mr. Cox and Harris, authorities and various pro-bono attorneys representing Harris have actually committed criminal acts in furtherance of this fraud.



Through the diligent and time-consuming work of advocates and legal counsel representing Mr. Cox, slowly but surely, the layers of the onion and the never-ending stream of lies of Harris are being exposed.

While this organization has yet to confirm, Harris boastfully confided in one of the persons interviewed in this case, that she had falsely accused a fellow male student of rape during the time she attended Cal Poly San Luis Obispo and was able to avoid college tuition and related costs. Due to privacy laws and the lack of cooperation on the part of the school, NCFM is finding it difficult, verifying this claim by Harris.

The truth is that Harris is a serial liar and false accuser. She is a professional con-artist and grifter, and makes a living off of various false claims, insurance claims, and state and local services while falsely proclaiming her 'victim' status.

The truth is that Harris is a one-woman crime wave who has left a trail of devastation and destruction in her wake, which has been facilitated by dishonest public officials, attorneys, prosecutors, law enforcement officers and law firms.

What is needed in this case are the following.

1. A full and complete unbiased investigation of the attorneys and law firms by the California State Bar and the sanctioning of the attorneys who have submitted a fraudulent and perjured filing. The State Bar must consider sanctions that include disbarment and a referral for a criminal investigation.
2. The California State Bar must notify the Office of the California Attorney General to initiate an investigation of Harris for a violation of the False Claims Act, California Government Code Sections 12650 – 12656, and to initiate a civil action to recover those funds that she fraudulently obtained.
3. The California State Bar must request and coordinate an investigative effort with the Federal Bureau of Investigation to investigate the crime spree of Harris as well as the misconduct and potential criminal conduct of public officials and attorneys who have facilitated, enabled and covered-up her crimes.



4. The California State Bar must provide a written directive warning the law firm of Jones Day and the Family Violence Appellate Project, or any entity, attorney, law firm, or public entity, acting on their behalf or direction, to refrain from taking any retaliatory action against this organization, Mr. Cox, or any other person or attorney who has advocated for and represented Mr. Cox, or any person who has or may cooperate in his efforts or legal actions for the violation of his civil and constitutional rights. This written directive must be provided to this organization and Mr. Cox as soon as possible.

Per normal business practices, NCFM respectfully requests that the California State Bar notify this organization on official letterhead, that this complaint package has been received. We also respectfully request copies of any official requests for inquiries to other governmental or oversight bodies. Those documents are to be sent via electronic mail at [president@ncfm.org](mailto:president@ncfm.org) to have an electronic trail of information and acknowledgement.

Very respectfully,

  
President

cc:

Attachment: 66-page Brief filed by the Law Firm of Jones Day  
and the Family Violence Appellate Project