

Administrative Office of the Courts



INVESTIGATION SUMMARY, DETERMINATION, PROBABLE CAUSE REVIEW AND RECOMMENDATION REPORT

Complaint No. 25-CI001

Certificate No. [REDACTED]

February 2, 2026

Certification and Licensing Division

**ARIZONA SUPREME COURT
ADMINISTRATIVE OFFICE OF THE COURTS
INVESTIGATION SUMMARY, DETERMINATION, PROBABLE
CAUSE REVIEW AND RECOMMENDATION REPORT**

<i>CERTIFICATE HOLDER INFORMATION</i>	Certificate Holder:	Laurie Desmarais
	Certification Number:	██████
	Business Name:	Confuse the Dead, LLC
	Type of Certificate:	Confidential Intermediary
<i>COMPLAINANT</i>	Name:	Arayah Gordon
<i>INVESTIGATION INFORMATION</i>	Complaint Number:	25-CI001
	Investigator:	Crystal Jones
Complaint Received:		June 30, 2025
Complaint Forwarded to the Certificate Holder:		July 3, 2025
Certificate Holder Received Complaint:		July 25, 2025
Response From Certificate Holder:		July 7, 2025
Period of Active Certification:		April 16, 2024 - Present
Status of Certification:		Active
Availability of Certificate Holder:		Available
Availability of Complainant:		Available
Report Date:		February 2, 2026

ALLEGATIONS:

1. Laurie Desmarais engaged in unprofessional conduct by failing to provide the services for which complainant paid.
2. Laurie Desmarais engaged in unacceptable practice by failing to respond to complainant's multiple communications to resolve a matter.

ADDITIONAL FINDINGS:

None.

SUMMARY OF INVESTIGATIVE PROCEDURE:

- Written complaint and documentation submitted by complainant, Arayah Gordon ("Gordon").
- Written response and documentation submitted by certificate holder, Laurie Desmarais ("Desmarais").
- Review of applicable Certification and Licensing Division ("Division") records.

- Review of applicable sections of Arizona Revised Statutes (“A.R.S.”), Arizona Codes of Judicial Administration (“ACJA”) §7-201 and §7-203, and Arizona Supreme Court Rules.

INTERVIEWS:

1. Dana Young

SUMMARY OF FACTUAL FINDINGS OF INVESTIGATION

The Division substantiated Allegations 1 and 2.

Allegation 1: Laurie Desmarais engaged in unprofessional conduct by failing to provide the services for which complainant paid.

Complainant, Gordon alleged that Desmarais, a certified Confidential Intermediary (“CI”), failed to provide the agreed-upon services after Desmarais received payment on June 9, 2024, for \$100. The service was to supply Gordon’s original birth certificate so that she could get a name change and tribal membership.

In her correspondence with the Division, Desmarais explained that this was only her second case and that she intended to follow the legal procedure for obtaining the birth certificate through the court process. She stated that she filed a motion with the court to obtain the record as instructed during CI training. Desmarais further reported that she recognized the request extended beyond her standard CI duties and, uncertain about the correct procedure, sought guidance from another CI. Desmarais stated she was told she could not release the original birth certificate and should instead direct the client to contact the tribe directly for assistance.

Desmarais stated that she subsequently informed the client that Desmarais was waiting for Vital Records, (Arizona Department of Health Services, Vital Records). Desmarais later received confirmation from Vital Records that she was not authorized to release the birth certificate directly to the client.

Additionally, Desmarais stated that she accepted the case in good faith, believing she was acting within the scope of her authority. Desmarais explained that she sought clarification at several points regarding whether an original birth certificate could be released to an adoptee and what she perceived as conflicting information between CI training and guidance from Vital Records. Desmarais further indicated that she understood her role to include acting as an intermediary between the court, client, and Vital Records to obtain original birth certificates when permitted by statute and court order.

Desmarais's statement reflects a misinterpretation of the scope of a CI’s legal authority under A.R.S. §8-134(C). The statute allows a CI to:

- Access certain court records solely for facilitating contact or the exchange of non-identifying information between members of the adoption triad or siblings; and
- Do so only under court authority and with the consent of all relevant parties.

ACJA §7-203(A) defines a search to mean “the process in which a confidential intermediary, on the request of a qualified individual when ordered by a court, reviews court, agency, and public or other authorized records to locate information regarding an adoptee, birth parent, adoptive parent, birth sibling of an adoptee, or sibling of a former dependent child.”

ACJA §7-203(F)(4) involving sharing of information, states that a CI may only use confidential information, in this case a birth certificate, “only to arrange a contact or to share information between the person who initiates the search and the person who is the subject of the search...”

ACJA §7-203(J)(1)(b) involves confidentiality but notes that the CI’s use of confidential information is “only to arrange a contact or to share...between parties who initiated the search and the person who is subject of the search.”

ACJA §7-203(J)(2)(b) requires that CI’s maintain competence in the field and ensure that their knowledge of all laws applicable to adoption and sibling information exchange issues remain current.

- b. After obtaining certification, the confidential intermediary must maintain competence in the field and ensure that their knowledge of all laws application [sic] to adoption and sibling information exchange issues remains current.

Although the allegation is that Desmarais failed to provide the services for which the complaint paid, the issue is that the services Desmarais agreed to provide to Gordon did not involve conducting a search for the purpose of locating an adoptee, birth or adoptive parent etc., commonly undertaken by CIs. Rather, Desmarais agreed to locate a birth certificate for Gordon so that she could secure tribal benefits. This is inconsistent with the basis for which a search is conducted.

Therefore, Desmarais offered to perform a service that fell outside the scope of what a CI is permitted to provide under Arizona law and code. The statutory framework does not authorize a CI to independently release birth certificates to clients. The duties of a CI are expressly limited to locating parties, facilitating contact, and providing non-identifying information in compliance with confidentiality laws.

The Division further notes that after accepting the Gordon case, Desmarais consulted two CIs (“Mark” (unknown last name) and Dana Young (“Young”) for guidance regarding her client’s request for an original birth certificate for the stated purpose, and both CIs told Desmarais that releasing an original birth certificate is not permitted under Arizona law. The Division confirmed this information through an interview with Young at Discovery

Detective Group, who stated that she had told Desmarais that the original birth certificate could not be released. Young explained that Mark, who also works at the agency, had informed Young that he spoke briefly with Desmarais and directed her to consult with Young, as she was more knowledgeable on the matter. Young further explained that while a CI may file a motion with the court to obtain information from a birth certificate, the document itself cannot be released to a client. Young stated she told Desmarais that she should instead direct Gordon to contact the tribe, as the tribe would be in a better position to assist with the client's request. Young emphasized that any information obtained by a CI from a birth certificate must remain in the CI's file and cannot be provided directly to the client.

Although Desmarais discontinued the service once she learned the request was outside her authority, she did not return the client's payment. In response to complaint, Desmarais stated that Gordon has fees due. Desmarais provided the Division with Gordon's invoice for an additional \$241.12. Because the service offered and accepted was not legally authorized under A.R.S. §8-134 or CI code, any fee collected for that service falls outside what a CI may charge.

ACJA §7-203(J)(3)(a) expressly limits fees to those "reasonably and necessarily incurred in conducting the search and providing authorized services" under applicable statutes and administrative orders. Here, the task for which Desmarais accepted payment (\$100), obtaining and releasing an original birth certificate, is not an authorized CI function and cannot form a lawful basis for fee collection. As the work performed did not constitute an authorized service, returning the funds in this circumstance would have demonstrated a good-faith effort to remedy the situation and would have helped address the concerns arising from her initial acceptance of a service she could not provide.

ACJA §7-201(F)(1):

1. Code of Conduct. Each individual certificate holder shall adhere to the code of conduct or standards of conduct, subsection (J) in the applicable section of the ACJA.

ACJA §7-201(H)(6)(a):

- a. Failed to perform any duty to discharge any obligation in the course of the certificate holder's responsibilities as required by law, court rules, this section or the applicable section of the ACJA;

ACJA §7-203(J)(1)(b) and (d):

- b. The confidential intermediary must keep confidential all information obtained during a search and may use the confidential information only to arrange a contact or to share, as permitted by A.R.S. §§ 8-134(D) and 8-543(C), between the person who initiated the search and the person who is the subject of the search.

d. The confidential intermediary must perform all duties and responsibilities under Arizona laws relating to adoption, including those limiting the release of information.

ACJA §7-203(J)(2)(b):

b. After obtaining certification, the confidential intermediary must maintain competence in the field and ensure that their knowledge of all laws application [sic] to adoption and sibling information exchange issues remains current.

ACJA §7-203 (J)(3)(a):

a. The confidential intermediary may only charge fees and expenses reasonably and necessarily incurred in conducting the search and providing authorized services under applicable statutes, ACJA § 7-201, this section, and administrative orders adopted by the supreme court.

ACJA §7-203(J)(5)(d):

d. A confidential intermediary must be cognizant of any limitations on their knowledge and experience. If ACJA § 7-201, this section, administrative orders, Arizona statutes, standards of conduct, or training manuals do not provide guidance sufficient to address difficult issues, the confidential intermediary may consult other experienced confidential intermediaries about a case under subsection (J)(1)(g). Nonetheless, a confidential intermediary is ultimately responsible for decisions made in any case in which another confidential intermediary is consulted.

ACJA §7-203(J)(6):

6. Compliance. The confidential intermediary must perform all services and discharge all obligations in accordance with current Arizona and federal laws, ACJA § 7-201, this section, and administrative orders adopted by the supreme court governing the certification of confidential intermediaries.

A.R.S. §8-134 (C):

...The intermediary shall use confidential information only to arrange a contact or share information between the person who initiates the search and the person who is the subject of the search.

In conclusion, the underlying violation or misconduct is not necessarily that Desmarais failed to provide the services for which the complainant paid. Complainant, Gordon, paid Desmarais to obtain a birth certificate to secure tribal benefits. Desmarais did try to obtain the birth certificate for her client. The violation/misconduct involves Desmarais performing a CI service which exceeded the scope of a confidential intermediary.

Allegation 1 is substantiated

Allegation 2: Laurie Desmarais engaged in unacceptable practice by failing to respond to complainant's multiple communications to resolve a matter.

In her complaint and correspondence with the Division, Gordon alleged that Desmarais failed to respond to multiple attempts to communicate regarding the status of her case. Gordon reported that after being initially informed by Desmarais that her birth certificate could be obtained, she was later told it could not be accessed due to Arizona law, with no further explanation provided. Gordon stated this created confusion because the information conflicted with earlier representations. Gordon further reported that after requesting that Desmarais prepare a written statement for the court, Desmarais indicated she would consider the request but then ceased responding to calls and did not reply to any additional inquiries.

In her correspondence with the Division, Desmarais acknowledged that, since the filing of the complaint, she did not provide Gordon with any explanation regarding legal limitations or barriers preventing access to the birth certificate. Desmarais also stated that she closed the case on July 4, 2025, without resolution.

The code requires PCIs to maintain timely and professional communication. The reported failure to respond to Gordon's communications, the lack of explanation regarding the inability to access the birth certificate, and the closure of the case without a documented report to the client fall below these professional standards.

ACJA §7-201(F)(1):

1. Code of Conduct. Each individual certificate holder shall adhere to the code of conduct or standards of conduct, subsection (J) in the applicable section of the ACJA.

ACJA §7-203(J)(2)(c) and (g):

- c. The confidential intermediary must inform the parties of the availability of resources for support.
- g. The confidential intermediary must keep the client reasonably informed about the status of the search and promptly comply with reasonable requests for information.

ACJA §7-203(J)(6):

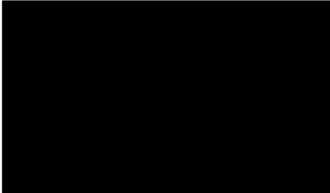
6. Compliance. The confidential intermediary must perform all services and discharge all obligations in accordance with current Arizona and federal laws, ACJA § 7-201, this section, and administrative orders adopted by the supreme court governing the certification of confidential intermediaries.

Allegation 2 is substantiated.

DISCIPLINARY HISTORY:

None.

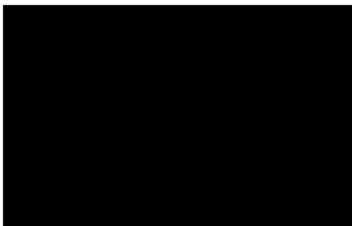
SUBMITTED BY:



Crystal Jones, Investigator
Certification and Licensing Division

February 2, 2026

REVIEWED BY:

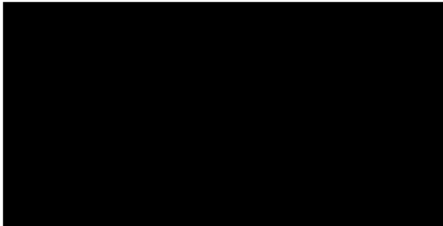


Pasquale Fontana, Manager
Certification and Licensing Division

February 2, 2026

Date

REVIEWED BY:



Abigail Raddatz, Director
Certification and Licensing Division

March 13, 2026

Date

**ARIZONA SUPREME COURT
ADMINISTRATIVE OFFICE OF THE COURTS
REVIEW AND DECISION OF THE PROBABLE CAUSE
EVALUATOR**

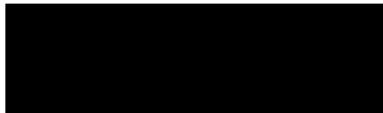
REVIEW AND DECISION OF THE PROBABLE CAUSE EVALUATOR:

Pursuant to ACJA § 7-201(H)(5)(a), the deputy director, serving in the capacity of probable cause evaluator under ACJA §7-201(D)(3)(a), having conducted an independent review of the facts and evidence gathered during the course of the investigation of complaint number 25-CI001:

- ☐ Directs division staff to investigate further.
- ☐ Determines probable cause does not exist demonstrating the certificate holder has committed any acts of misconduct or violations of the statutes, court rules, this section, or the applicable section of the ACJA and enters a written finding to that effect as to Allegation(s):
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- ☒ Determines probable cause exists demonstrating the certificate holder has committed one or more acts of misconduct or violations of the statutes, court rules, this section, or the applicable section of the ACJA and enters a written finding to that effect as to Allegation(s):
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1 and 2



Jeffrey Schrade
Probable Cause Evaluator

4/1/2026

Date

**ARIZONA SUPREME COURT
ADMINISTRATIVE OFFICE OF THE COURTS
RECOMMENDATION TO THE BOARD**

***CERTIFICATE
HOLDER
INFORMATION***

Certificate Holder:
Certification Number:
Business Name:
Type of Certificate:

Laurie Desmarais
[REDACTED]
Confuse the Dead, LLC
Confidential Intermediary

**RECOMMENDATION TO THE CONFIDENTIAL INTERMEDIARY
("BOARD"):**

It is recommended that the Board accept the finding of the Probable Cause Evaluator and enter a finding Laurie Desmarais has committed the alleged act(s) of misconduct as to Allegations 1 and 2, as detailed in the Investigation Summary, Determination, Probable Cause Review and Recommendation Report in complaint number 25-CI001.

It is further recommended that the Board enter a finding grounds for informal disciplinary action exists under Arizona Code of Judicial Administration ("ACJA") §7-201(H)(6) for act(s) of misconduct involving ACJA §§7-201(F)(1), 7-201(H)(6)(a); ACJA §§7-203(J)(1)(b) and (d), 7-203(J)(2)(b), (c), and (g), 7-203(J)(3)(a), 7-203(J)(5)(d), 7-203(J)(6); and A.R.S. §8-134 (C).

When making recommendations for disciplinary action, the Division considered the following mitigating and aggravating factors:

Mitigating factors pursuant to ACJA §7-201(H)(22)(b)(1):

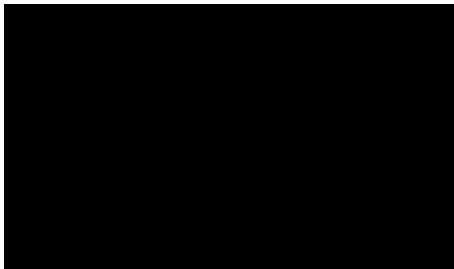
- ☒ **The absence of a prior disciplinary record;**
- ☒ **The absence of a dishonest motive;**
- ☐ The absence of a selfish motive;
- ☐ Personal or emotional problems;
- ☐ A timely good faith effort to make restitution or to rectify consequences of misconduct;
- ☒ **Full and free disclosure to the division staff, the board or the hearing officer;**
- ☒ **A cooperative attitude toward any proceedings;**
- ☒ **Inexperience in the practice of the profession or occupation;**
- ☐ Character or reputation;
- ☐ Physical or mental disability;
- ☐ Physical or mental impairment;
- ☐ Delays in the disciplinary proceedings;
- ☐ Interim rehabilitation;
- ☐ Imposition of other penalties or sanctions;
- ☐ Remorse;
- ☐ The remoteness of prior offenses;
- ☐ Other:

Aggravating factors pursuant to ACJA §7-201(H)(22)(b)(2):

- ☐ A prior disciplinary record;
- ☐ A dishonest motive;
- ☐ A selfish motive;
- ☒ **Multiple offenses; (two substantiated allegations)**
- ☐ Bad faith obstruction of the disciplinary proceedings by intentionally failing to comply with this section, the applicable section of ACJA, court rules or orders of the hearing officer; (Failure to respond to Division requests sent to a valid point of contact reflects an uncooperative attitude toward the investigation)
- ☐ Submission of false evidence, false statements or other deceptive practices during the discipline process;
- ☐ Refusal to acknowledge wrongful nature of the conduct;
- ☐ Vulnerability of the victim;
- ☐ Substantial experience in the profession or occupation;
- ☒ **Indifference to making restitution; (failure to refund professional fees to client)**
- ☐ Other: _____

It is further recommended that the Board direct the Division to issue a Letter of Concern to Laurie Desmarais.

SUBMITTED BY:



April 1, 2026

Abigail Raddatz, Director Date
Certification and Licensing Division

**ARIZONA SUPREME COURT
ADMINISTRATIVE OFFICE OF THE COURTS
DECISION AND ORDER OF THE BOARD**

DECISION AND ORDER:

The Board having reviewed the above Investigation Summary, Determination, Probable Cause Review and Recommendation Report, regarding complaint number 25-CI001 and Laurie Desmarais, certificate number [REDACTED], makes a finding of facts and this decision, based on the facts, evidence, and analysis as presented and:

☐ Request division staff to conduct further investigation;

☐ Refer the complaint to another entity with jurisdiction;

Referral to: _____

☐ Determine no violation exists and dismiss the complaint

☐ with prejudice

☐ without prejudice

☐ Determine no acts of misconduct or violation occurred and no discipline is warranted; however the certificate holder's actions need modification or elimination and issue an advisory letter pursuant to subsection (D)(5)(c)(1)(g);

☐ Enter a finding the certificate holder has violated any provisions of the statutes, court rules, this section, or the applicable ACJA specific sections or subsection (H)(6) and order an emergency summary suspension, pursuant to subsection (H)(9)(d);

☒ Enter a finding the certificate holder has violated any of the provisions of the statutes, court rules, this section, the applicable ACJA sections or subsection (H)(6) and issue an order imposing any or a combination of the following information or formal disciplinary sanctions:

☒ Issue a letter of concern

☐ Issue a censure

☐ Resolve any found acts of misconduct or violations by consent order or other negotiated settlement

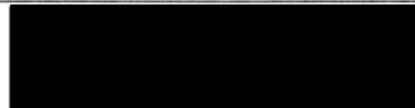
☐ Place specific restrictions on a certificate

☐ Place the certificate holder on probation or a set period of time under specified conditions

- ☐ Mandate additional training for the certificate holder
- ☐ Issue a cease and desist order pursuant to subsection (E)96)
- ☐ Order suspension of a certificate for a set period of time with specific conditions for reinstatement
- ☐ Order revocation of a certificate with specific conditions for reinstatement
- ☐ Assess costs associated with the investigation and disciplinary proceedings; or
- ☐ Impose civil penalties associated with the investigation and disciplinary proceedings.
- ☐ Order the preparation of documents necessary for informal or formal disciplinary actions under subsection (H)(7)(b), (H)(8)(b) or (H)(9)(b)
- ☐ Request the license holder appear before the Board to participate in a Formal Interview, pursuant to ACJA § 7-201(H)(8).
- ☐ Enter a finding the public health, safety or welfare is at risk, requires emergency action, and orders the immediate emergency suspension of the license and sets an expedited hearing for:

Date, Time, and Location: _____

- ☐ Order the filing of Notice of Formal Charges, pursuant to ACJA § 7-201(H)(10).
- ☒ Adopts the recommendations of the Division Director.
- ☐ Does not adopt the recommendations of the Division Director and orders:



Vernon Harris, Chair Date
 Confidential Intermediary Board

April 14 2026