

BEFORE THE PRESIDING DISCIPLINARY JUDGE

**IN THE MATTER OF A MEMBER
OF THE STATE BAR OF
ARIZONA**

**MICHAEL S. REEVES
Bar No. 010420,

Respondent.**

PDJ 2026-9023

**FINAL JUDGMENT AND
ORDER**

[State Bar No. 25-2766]

FILED MAY 22, 2026

The Presiding Disciplinary Judge having accepted the parties' Agreement for Discipline by Consent ("Agreement") submitted pursuant to Rule 57(a), Ariz. R. Sup. Ct.,

IT IS ORDERED that **MICHAEL S. REEVES, Bar No. 010420**, is Reprimanded for his conduct in violation of the Arizona Rules of Professional Conduct.

IT IS FURTHER ORDERED that Respondent Reeves is placed on Probation for a period of one (1) year. The terms of probation shall include:

1. Continuing Legal Education ("CLE"): In addition to annual MCLE requirements, Respondent shall complete within the term of probation, no less than six (6) hours of

CLE program(s) regarding the ethical use of Artificial Intelligence, *e.g.*:

(a) Ghost in the Brief: Ethical Pitfalls of AI Generated Work Product (2 hours)

(b) Competency, Confidentiality, and Candor for Your AI-Powered Practice (1 hour)

(c) Artificial Intelligence for Lawyers (3 hours)

(d) A Journey Through the Labyrinth of AI: Understanding, Utilizing and Safeguarding Artificial Intelligence in Law (3 hours)

• Respondent shall provide the State Bar Compliance Monitor with evidence of completion of each program by providing:

(1) the certificate of completion; and

(2) a copy of either:

(a) his handwritten notes, or

(b) typed or electronic notes;

accompanied by a declaration, statement or affidavit that complies with Civil Rule 80(c), which states he personally typed

the notes while viewing the CLE program.

- Respondent should contact the Compliance Monitor at (602)340-7258 to make arrangements to submit this evidence.

- Respondent will be responsible for the costs of the CLE.

2. LOMAP Law Office Management Assistance Program

("LOMAP") (one-time consult):

(a) Respondent shall contact the State Bar Compliance Monitor at (602)340-7258, within ten (10) days of service of this Order.

(b) Respondent shall submit to a one-time LOMAP consultation regarding the use of Artificial Intelligence in the practice of law.

(c) Respondent shall complete any follow up deemed necessary by LOMAP.

(d) Respondent will be responsible for any costs associated with LOMAP.

3. Respondent Reeves shall not commit any further violations of the Rules of Professional Conduct or Rules of the Supreme Court of Arizona.

IT IS FURTHER ORDERED that Respondent Reeves shall pay the costs and expenses of the State Bar of Arizona in the amount of \$1,200.00 within 30 days. There are no costs or expenses incurred by the Office of the Presiding Disciplinary Judge in these proceedings.

DATED this 22nd day of May, 2026.

Lisa A. VandenBerg
Hon. Lisa A. VandenBerg
Presiding Disciplinary Judge

Copy of the foregoing emailed
this 22nd day of May, 2026, to:

Craig Henley
LRO@staff.azbar.org

Michael S. Reeves
sportclips1212@yahoo.com

by: CLopez

BEFORE THE PRESIDING DISCIPLINARY JUDGE

**IN THE MATTER OF A MEMBER
OF THE STATE BAR OF ARIZONA**

**MICHAEL S. REEVES
Bar No. 010420,

Respondent.**

PDJ 2026-9023

**ORDER ACCEPTING
AGREEMENT FOR
DISCIPLINE BY CONSENT**

[State Bar No. 25-2766]

FILED MAY 22, 2026

On May 14, 2026, the parties filed an Agreement for Discipline by Consent (“Agreement”) pursuant to Rule 57(a), Arizona Rules of Supreme Court (“Ariz. R. Sup. Ct.”). The State Bar of Arizona is represented by Senior Bar Counsel Craig Henley. Respondent Michael S. Reeves is self-represented.¹ The Agreement seeks to address the State Bar No. 25-2766. No probable cause order has been entered, and no formal complaint has been filed in this matter.

Contingent upon approval of the proposed form of discipline, Respondent voluntarily waives his right to an adjudicatory hearing, as well

¹ The Agreement indicates that Respondent Reeves has chosen not to seek the assistance of counsel.

as all motions, defenses, objections, or requests that could be asserted. Pursuant to Rule 53(c)(3), Ariz. R. Sup. Ct., the State Bar provided Notice of the Agreement and an opportunity to file a written objection to the Complainant on March 11, 2026. The Agreement indicated the Complainant does not object to the Agreement.

The Agreement details a factual basis in support of Respondent Reeves' conditional admissions and is incorporated by reference.² Michael S. Reeves conditionally admits his conduct violated Ariz. R. Sup. Ct., Rule 42, specifically ER 1.1 (failure to provide competent representation), ER 1.3 (failure to act with reasonable diligence), ER 3.1 (meritorious claims and contentions), and ER 8.4(d) (engaging in conduct that is prejudicial to the administration of justice of the Arizona Rules of Professional Conduct. As a sanction, the parties agree to Reprimand with Probation. Respondent also agrees to pay the costs and expenses of the disciplinary proceeding.

There are no conditional dismissals, and restitution is not an issue in this matter.

² See Rule 57(a), Ariz. R. Sup. Ct.

Generally speaking, the ethical issue arose during Mr. Reeves' representation of a client in a criminal matter. Mr. Reeves filed a Reply to his motion to modify the conditions of release containing unverified legal citations produced using artificial intelligence. The legal citations in the Reply were visibly invalid and some of the summaries Mr. Reeves' provided mischaracterized the case analysis and/or holdings.

Mr. Reeves admitted to the State Bar, he had recently learned of and began using Artificial Intelligence ("AI") shortly before this matter and was unaware of the risks that AI could create false case law citations and findings. Since this matter, Mr. Reeves has increased his knowledge of AI and has altered his practices and procedures.

Sanctions imposed against lawyers "shall be determined in accordance with the American Bar Association's *Standards for Imposing Lawyer Sanctions*" ("ABA Standards"). Rule 58(k), Ariz. R. Sup. Ct. In determining an appropriate sanction, the PDJ considers: the duties violated, the lawyer's mental state, the actual or potential injury caused by the misconduct, and the existence of aggravating and mitigating factors. ABA Standard 3.0.

Mr. Reeves agrees that he “negligently” failed to diligently review or verify the accuracy of citations created by Artificial Intelligence before filing documents containing false citations with the court. The Agreement reflects that Mr. Reeves violated his duties to the client and the legal system. Mr. Reeves agrees his conduct resulted in potential harm to the client and, while de minimis, actual harm to the legal system.

The Agreement relies on ABA *Standards* 4.53 (*Lack of Competence*), 4.43 (*Lack of Competence*), and 6.23 (*Abuse of the Legal Process*) as the appropriate *Standards* given the facts and circumstances of this matter.

Standard 4.53 provides,

Reprimand is generally appropriate when a lawyer:

- (a) demonstrates failure to understand relevant legal doctrines or procedures and causes injury or potential injury to a client; or
- (b) is negligent in determining whether he or she is competent to handle a legal matter and causes injury or potential injury to a client.

Standard 4.43 provides,

Reprimand is generally appropriate when a lawyer is negligent and does not act with reasonable diligence in representing a client, and causes injury or potential injury to a client.

Standard 6.23 provides,

Reprimand is generally appropriate when a lawyer negligently fails to comply with a court order or rule, and causes injury or potential injury to a client or other party, or causes interference or potential interference with a legal proceeding.

The Agreement recites two aggravating factors: 9.22(a) prior disciplinary offenses;³ and 9.22(i) substantial experience in the practice of law.⁴

The Agreement identifies three mitigating factors: 9.32(b) absence of a dishonest or selfish motive; 9.32(e) full and free disclosure to disciplinary board or cooperative attitude toward proceedings; and 9.32(m) remoteness of prior offenses.

The PDJ understands, the “Court has long held that ‘the objective of disciplinary proceedings is to protect the public, the profession and the administration of justice and not to punish the offender.’ ” *In re Peasley*, 208 Ariz. 27, 38, ¶ 48 (2004) (internal citations omitted); *see also Scholl*, 200 Ariz.

³ SB06-1853 (January 2008): He received an Admonition for violating Rule 42, Ariz. R. Sup. Ct., ER 1.5(d)(3), ER 1.15(d), and ER 8.4(d) (failure to timely turn over funds to an estate which contributed to the delay in closing the estate. SB02-2203 (April 2004): He received an Order of Probation (Fee Arbitration) for violating Rule 42, Ariz. R. Sup. Ct., ER 1.4 and ER 1.15(D) (failure to provide the clients with an accounting for legal services rendered).

⁴ Respondent Reeves was licensed to practice law in Arizona on January 7, 1986.

222, 227, ¶ 29 (“The purpose of professional discipline is twofold: (1) to protect the public, the legal profession, and the justice system, and (2) to deter others from engaging in misconduct.”). After reviewing the matters presented, the PDJ concludes that the Agreement achieves appropriate protections to the public and the other recognized purposes of the lawyer discipline process.

IT IS ORDERED accepting the Agreement for Discipline by Consent.

A final judgment and order is separately filed this date.

DATED this 22nd day of May, 2026.

Lisa A. VandenBerg
Hon. Lisa A. VandenBerg
Presiding Disciplinary Judge

Copy of the foregoing e-mailed
this __ day of May, 2026 to:

Craig Henley
LRO@staff.azbar.org

Michael S. Reeves
sportclips1212@yahoo.com

by: CLopez

05-14-2026

C. LOPEZ
DISCIPLINARY CLERK

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Respondent

BEFORE THE PRESIDING DISCIPLINARY JUDGE

**IN THE MATTER OF A MEMBER
OF THE STATE BAR OF ARIZONA,**

**MICHAEL S. REEVES
Bar No. 010420**

Respondent.

PDJ 2026-9023

**AGREEMENT FOR DISCIPLINE
BY CONSENT**

State Bar File No. 25-2766

The State Bar of Arizona, and Respondent Michael S. Reeves, who has chosen not to seek the assistance of counsel, hereby submit their Agreement for Discipline by Consent pursuant to Rule 57(a), Ariz. R. Sup. Ct.

A Probable Cause Order has not been entered in this matter.

Respondent voluntarily waives the right to an adjudicatory hearing, unless otherwise ordered, and waives all motions, defenses, objections or requests which

have been made or raised, or could be asserted thereafter, if the conditional admission and proposed form of discipline is approved.

Pursuant to Rule 53(c)(3), Ariz. R. Sup. Ct., notice of this agreement was provided to the Complainant on March 11, 2026 and does not oppose the agreement.

Respondent conditionally admits that his conduct, as set forth below, violated Rule 42, Ariz. R. Sup. Ct., ERs 1.1, 1.3, 3.1, and 8.4(d).

Upon acceptance of this agreement, Respondent agrees to accept imposition of the following discipline: Reprimand with Probation terms of which are set in Sanctions below.

Respondent also agrees to pay the costs and expenses of the disciplinary proceeding, within 30 days from the date of this order. If costs are not paid within the 30 days interest will begin to accrue at the legal rate.¹

The State Bar's Statement of Costs and Expenses is attached hereto as Exhibit A.

¹ Respondent understands that the costs and expenses of the disciplinary proceeding include the costs and expenses of the State Bar of Arizona, the Disciplinary Clerk, the Probable Cause Committee, the Presiding Disciplinary Judge and the Supreme Court of Arizona.

FACTS

GENERAL ALLEGATIONS

1. On January 7, 1986, Respondent was licensed to practice law in Arizona.

COUNT ONE (File No. 25-2766/Kalish)

2. On February 5, 2025, Shawn Bruce Brown was indicted in the Maricopa County Superior Court case of *State v. Shawn Bruce Brown*, CR2025-101780 for Kidnapping, a class 2 felony, and Aggravated Assault, a class 4 felony domestic violence offense.

3. While Respondent is primarily a death penalty defense attorney, he is a long-time close friend of Brown's family and has previously provided legal services to family members.

4. Respondent is a solo practitioner but receives assistance from court-appointed staff in his larger cases as well as a shared office receptionist for the building.

5. Respondent explains that he frequently has appointed investigators and clerks to assist in his cases.

6. While he did not have a writing specific to the criminal case, they agreed to a discounted hourly rate of \$250.00 for Respondent's representation of Brown based on his ongoing relationship with the Brown family.

7. On February 12, 2025, the Court conducted an arraignment and set a \$25,000.00 appearance bond.

8. On March 19, 2025, the State filed, among other things, an allegation of aggravating circumstances, an allegation of prior felony conviction, and an allegation of offenses committed while on release from confinement.

9. On April 28, 2025, Respondent filed a motion to modify the conditions of release. The filing was factual in nature and did not include any case law citations.

10. On May 1, 2025, the Court conducted an initial pretrial conference. One issue raised was the pending motion to modify. The Court ordered the State to file a response by May 13, 2025, and set an oral argument for May 15, 2025.

11. On May 12, 2025, the State filed an objection to the motion to modify which contained multiple case law citations.

12. That same day, Respondent filed a reply to the State's objection that contained three case law citations.

13. The Browns were billed 1.5 hours and paid \$375.00 for reviewing, researching, preparing, and e-mailing the clients a copy of the May 12, 2025, reply.

14. While one of the cases was accurately cited, two cited cases and the related purported findings were not:

- "See *United States v. Perez*, 2021 WL 3711958 (D. Md. Aug. 20, 2021) (court allowed contact between domestic partners after considering

victim's voluntary request and lack of evidence of ongoing threat); *State v. Linton*, 156 Idaho 258, 322 P.3d 1051 (CT. App. 2014) (modification of no-contact order was proper where victim voluntarily sought contact and defendant complied with all conditions of release)."

15. On May 15, 2025, the Court conducted an oral argument regarding the motion to modify.

16. The State argued that Respondent provided no supporting legal authority as the cited cases were either mistyped or did not exist.

17. Respondent then stated "...and I apologize other than my handwriting to my assistant that caused the errors in the citations. I didn't go back and check the citations. I'll go back and check today."

18. As a result, the Court permitted the parties to supplement their pleadings regarding the cited cases.

19. While the Court did not specifically order the parties to supplement their pleadings or provide a specific time to submit any supplement, Respondent sent an e-mail to the court and the State later that day stating, "[t]he court asked me to send over the cases cited in my reply to the motion to modify release conditions. Please see attached memo and cases."

20. The memo further states:

"Perez-Gallan, cited by sources as *United States v. Perez* or *Perez-Gallan*, 2021 WL 3711958 (D.Md. Aug. 20, 2021), also cited as 640 F.Supp. 3d at 700, attached, involved a domestic violence restraining order which allowed contact but which prohibited harassing, stalking, or threatening an intimate partner, but did not prohibit contact. P.4.

I could not find *State v. Linton*, except citations to it in articles. I did find another case from Idaho, *State v. Hall*, Idaho Supreme Court docket 48860, attached hereto, which states that Idaho courts have the authority to modify a no-contact order. P.10”

21. In an interview with the State Bar, Respondent explained that his primary intention at that time was to provide support for the requested relief as quickly as possible. He later learned that AI cannot be blindly relied upon and requires verification for accuracy.

22. The *Linton* case and the claimed factual findings do not exist.

23. The correct style and citation for the *Perez* case cited by Respondent is *United States v. Litsson Antonio Perez-Gallan*, 640 F.Supp.3d 697.

24. The cited case is not a Maryland case and it was not decided on August 20, 2021.

25. The correct jurisdiction for the *Perez-Gallan* case cited by Respondent is the Western District of Texas, Pecos Division. The correct date of the *Perez-Gallan* decision is November 10, 2022.

26. The actual *Perez-Gallan* case is a second amendment case evaluating the constitutionality of 18 U.S.C. 922(g)(8) which arises out the following facts:

“The facts are simple. Defendant Litsson Antonio Perez-Gallan was driving an 18-wheeler near the Mexico-United States border in Presidio, Texas when he entered a border patrol checkpoint. After Defendant was directed to a secondary inspection area, he was asked whether he was armed. Defendant said yes; he had a pistol with him. Defendant consented to a search, and border patrol agents found the pistol in Defendant's backpack.

Agents also found a Kentucky state court order in Defendant's wallet ("Court Order"). The Court Order outlined Defendant's conditions of release stemming from his May 2022 arrest for assault. The Government later discovered a separate restraining order against Defendant from a Kentucky family court ("Restraining Order"). Defendant was indicted in June 2022 for one count under 18 U.S.C. § 922(g)(8), which makes it a crime to possess a firearm while subject to a court order."

27. The case of *State of Idaho v. Melanie Nicole Hall*, Docket No. 48860 submitted to the Court by Respondent in his memorandum and referenced in his response to the State Bar arises out of the following facts:

In 2015, the State charged Hall with felony stalking of her ex-husband...Based on the charges, the district court entered a no contact order, and set it to expire in May 2017, prohibiting Hall from contacting her ex-husband.

In January 2016, a jury found Hall guilty of felony stalking...and [i]n March 2016, the district court entered a judgment of conviction for stalking and sentenced Hall to a five year unified sentence, with the first two years fixed. The court also entered an amended no contact order prohibiting Hall from contact with her ex-husband and their two minor children. The new no contact order was set to expire at 11:59 p.m. on March 28, 2021...

On March 26, 2021, two days before the order was set to expire, the State moved to extend the no contact order beyond the expiration date...Two days after the no contact order expired, on March 30, 2021, the district court held a hearing on the State's motion.

28. The *Hall* Court analyzed the following issue before the Court:

Hall brings her appeal asserting the sole issue is whether a district court has subject matter jurisdiction to modify a no contact order after its expiration date, if the underlying motion was filed before it expired. Hall argues the district court lost its authority to modify the no contact order upon its expiration; thus, the amended no contact order is invalid. The State counters that the district court retained subject matter jurisdiction to

rule on the State's motion because it was timely filed before the no contact order expired.

29. The *Hall* Court found that “the district court had authority to enter the amended no contact order because it was adjudicating a timely filed motion.”

30. On May 27, 2025, the Maricopa County Court denied Respondent's motion to modify.

31. In his written response to the State Bar, Respondent stated:

“I personally wrote the motion. I did use an AI tool to find case law to support my position. The case law produced by the AI seemed at the time to be sensible and as I was new to AI, as is everyone, I used the material generated by AI now to my embarrassment...”

If I said that my assistant could not read my writing, which I likely said, I was embarrassed and stumbling (sic) to think on the fly how I would have cited a case that was unfindable. I did not know at the time that it was because of an AI ‘hallucination’.”

32. In his subsequent interview with the State Bar, Respondent further explains that he had only recently become aware of ChatGPT and the reply was one of his first uses of artificial intelligence. Respondent also stated that, at the time of the hearing, “it did not even dawn on me that it was an AI error”.

CONDITIONAL ADMISSIONS

Respondent's admissions are being tendered in exchange for the form of discipline stated below and are submitted freely and voluntarily and not as a result of coercion or intimidation. Respondent conditionally admits that he violated Rule 42, Ariz. R. Sup. Ct., ERs 1.1, 1.3, 3.1, and 8.4(d).

CONDITIONAL DISMISSALS

There are no conditional dismissals.

RESTITUTION

Restitution is not an issue in this matter.

SANCTION

Respondent and the State Bar of Arizona agree that based on the facts and circumstances of this matter, as set forth above, the following sanctions are appropriate: Reprimand with Probation for one (1) year, subject to early termination upon completion of the terms of probation, which will consist of:

1. Continuing Legal Education (“CLE”): In addition to annual MCLE requirements, Respondent shall complete no less than six (6) hours of CLE program(s) regarding the ethical use of Artificial Intelligence, *e.g.*:

- Ghost in the Brief: Ethical Pitfalls of AI Generated Work Product (2 hours)
- Competency, Confidentiality, and Candor for Your AI-Powered Practice (1 hour)
- Artificial Intelligence for Lawyers (3 hours)
- A Journey Through the Labyrinth of AI: Understanding, Utilizing and Safeguarding Artificial Intelligence in Law (3 hours)

within the term of probation. Respondent shall provide the State Bar Compliance Monitor with evidence of completion of the program by providing the certificate of completion in addition to a copy of (a) his/her

handwritten notes; or (b) typed or electronic notes, accompanied by a declaration, statement or affidavit that complies with Civil Rule 80(c), and which states he/she personally typed the notes while viewing the CLE program. Respondent should contact the Compliance Monitor at 602-340-7258 to make arrangements to submit this evidence. Respondent will be responsible for the cost of the CLE.

2. LOMAP (one-time consult): Respondent shall contact the State Bar Compliance Monitor at (602) 340-7258, within 10 days from the date of service of this Order. Respondent shall submit to a one-time LOMAP consultation regarding the use of Artificial Intelligence in the practice of law. Respondent shall complete any follow up deemed necessary by LOMAP. Respondent will be responsible for any costs associated with LOMAP.

Respondent shall commit no further violations of the Rules of Professional Conduct.

NON-COMPLIANCE WITH PROBATION

If Respondent fails to comply with any of the foregoing probation terms and the State Bar of Arizona receives information thereof, Bar Counsel shall file a notice of noncompliance with the Presiding Disciplinary Judge, pursuant to Rule 60(a)(5), Ariz. R. Sup. Ct. The Presiding Disciplinary Judge may conduct a

hearing within 30 days to determine whether Respondent breached a term of probation and, if so, to recommend an appropriate sanction. If the State Bar alleges that Respondent failed to comply with any of the foregoing terms the burden of proof shall be on the State Bar of Arizona to prove noncompliance by a preponderance of the evidence.

If Respondent violates any of the terms of this agreement, the State Bar may bring further discipline proceedings.

LEGAL GROUNDS IN SUPPORT OF SANCTION

In determining an appropriate sanction, the parties consulted the American Bar Association's *Standards for Imposing Lawyer Sanctions (Standards)* pursuant to Rule 57(a)(2)(E). The *Standards* are designed to promote consistency in the imposition of sanctions by identifying relevant factors that courts should consider and then applying those factors to situations where lawyers have engaged in various types of misconduct. *Standard 1.3, In re Pappas*, 159 Ariz. 516, 768 P.2d 1161 (1988). The *Standards* provide guidance with respect to an appropriate sanction in this matter.

In determining an appropriate sanction, the Court considers the duty violated, the lawyer's mental state, the actual or potential injury caused by the misconduct and the existence of aggravating and mitigating factors. *Standard 3.0*.

The parties agree that the following *Standards* are the appropriate *Standards* given the facts and circumstances of this matter:

Rule 42, Ariz. R. Sup. Ct., ERs 1.1 and 8.4(d)

Standard 4.53

Reprimand is generally appropriate when a lawyer demonstrates failure to understand relevant legal doctrines or procedures [or benefits and risks associated with relevant technology] and causes injury or potential injury to a client; or is negligent in determining whether he or she is competent to handle a legal matter and causes injury or potential injury to a client. See also comment [6].

Rule 42, Ariz. R. Sup. Ct., ERs 1.3

Standard 4.43

Reprimand is generally appropriate when a lawyer is negligent and does not act with reasonable diligence in representing a client, and causes injury or potential injury to a client.

Rule 42, Ariz. R. Sup. Ct., ERs 3.1, and 8.4(d)

Standard 6.23

Reprimand is generally appropriate when a lawyer negligently fails to comply with a court order or rule, and there is injury or potential injury to a client or a party, or interference or potential interference with a legal proceeding.

The duty violated

Respondent's conduct violated his duty to the client and the legal system.

The lawyer's mental state

Respondent negligently failed to diligently review or verify the accuracy of citations created by Artificial Intelligence (AI) before filing documents containing

the false citations in a pending lawsuit which was prejudicial to the administration of justice and in violation of the Rules of Professional Conduct.

The extent of the actual or potential injury

There was potential harm to the client and, while de minimis, actual harm to the legal system.

Aggravating and mitigating circumstances

The presumptive sanction is Reprimand. The parties conditionally agree that the following aggravating and mitigating factors should be considered:

In aggravation:

a) 9.22(a) prior disciplinary offenses;

➤ SB06-1853 (January 2008): Respondent received an Informal Reprimand (now Admonition) for violating Rule 42, Ariz. R. Sup. Ct., ER1.5(d)(3), 1.15(d), and 8.4(d) by, among other things, failing to timely turn over funds to an estate which contributed to the delay in closing the estate.

➤ SB02-2203 (April 2004): Respondent received an Order of Probation (Fee Arbitration) for violating Rule 42, Ariz. R. Sup. Ct., ERs 1.4 and 1.15(d) by failing to provide the clients with an accounting for legal services rendered.

b) 9.22(i) substantial experience in the practice of law (January 7, 1986).

In mitigation:

a) 9.32(b) absence of a dishonest or selfish motive;

b) 9.32(e) full and free disclosure to disciplinary board or cooperative attitude toward proceedings;

c) 9.32(m) remoteness of prior offenses.

Discussion

The parties conditionally agree that, upon application, of the aggravating and mitigating factors the presumptive sanction is appropriate and that a greater or lesser sanction is not appropriate.

This agreement is based on the following:

As explained by Respondent, he learned of and began using AI shortly before the incident at issue in this matter. Accordingly, he was unaware of the risks associated with AI including the possibility that AI could create false case law citations and findings of fact. Respondent has since increased his knowledge of AI and altered his practices and procedures to minimize the likelihood of a future similar incident.

Based on the *Standards* and in light of the facts and circumstances of this matter, the parties conditionally agree that the sanction set forth above is within the range of appropriate sanction and will serve the purposes of lawyer discipline.

CONCLUSION

The object of lawyer discipline is not to punish the lawyer, but to protect the public, the profession and the administration of justice. In re *Peasley*, 208 Ariz. 27 (2004). Recognizing that determination of the appropriate sanction is the prerogative of the Presiding Disciplinary Judge, the State Bar and Respondent

believe that the objectives of discipline will be met by the imposition of the proposed sanction of Reprimand with Probation and the imposition of costs and expenses. A proposed form of order is attached hereto as Exhibit B.

DATED this 6th day of May 2026.

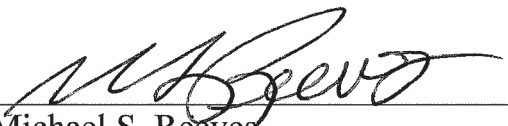
STATE BAR OF ARIZONA

/s/ Craig D. Henley

Craig D. Henley
Senior Bar Counsel

This agreement, with conditional admissions, is submitted freely and voluntarily and not under coercion or intimidation.

DATED this 12 day of May, 2026.



Michael S. Reeves
Respondent

Approved as to form and content

Maret Vessella
Chief Bar Counsel

Original filed with the Disciplinary Clerk of
the Office of the Presiding Disciplinary Judge
of the Supreme Court of Arizona
this ____ day of May 2026.

CONCLUSION

The object of lawyer discipline is not to punish the lawyer, but to protect the public, the profession and the administration of justice. In re *Peasley*, 208 Ariz. 27 (2004). Recognizing that determination of the appropriate sanction is the prerogative of the Presiding Disciplinary Judge, the State Bar and Respondent believe that the objectives of discipline will be met by the imposition of the proposed sanction of Reprimand with Probation and the imposition of costs and expenses. A proposed form of order is attached hereto as Exhibit B.

DATED this _____ day of April 2026.

STATE BAR OF ARIZONA

Craig D. Henley
Senior Bar Counsel

This agreement, with conditional admissions, is submitted freely and voluntarily and not under coercion or intimidation.

DATED this _____ day of April, 2026.

Michael S. Reeves
Respondent

Approved as to form and content



Maret Vessella
Chief Bar Counsel

Copy of the foregoing e-mailed
this 14th day of May 2026 to:

Honorable Lisa A. VandenBerg
Presiding Disciplinary Judge
Supreme Court of Arizona
1501 West Washington Street, Suite 102
Phoenix, Arizona 85007
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Michael S. Reeves
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Respondent

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by: /s/Odalys Leon Valdez
CDH/olv

EXHIBIT A

Statement of Costs and Expenses

In the Matter of a Member of
The State Bar of Arizona, Michael S. Reeves
Bar No. 010420, Respondent.

File No. 25-2766

Administrative Expenses

The Supreme Court of Arizona has adopted a schedule of administrative expenses to be assessed in lawyer discipline. If the number of charges/complainants exceeds five, the assessment for the general administrative expenses shall increase by 20% for each additional charge/complainant where a violation is admitted or proven.

Factors considered in the administrative expense are time expended by staff bar counsel, paralegal, secretaries, typists, file clerks and messenger; and normal postage charges, telephone costs, office supplies and all similar factors generally attributed to office overhead. As a matter of course, administrative costs will increase based on the length of time it takes a matter to proceed through the adjudication process.

General Administrative Expenses for above-numbered proceedings

\$1,200.00

Additional costs incurred by the State Bar of Arizona in the processing of this disciplinary matter, and not included in administrative expenses, are itemized below.

Additional Costs

Total for additional costs \$ 0.00

TOTAL COSTS AND EXPENSES INCURRED \$ 1,200.00

EXHIBIT B

BEFORE THE PRESIDING DISCIPLINARY JUDGE

**IN THE MATTER OF A MEMBER
OF THE STATE BAR OF
ARIZONA,**

**MICHAEL S. REEVES
Bar No. 010420**

Respondent.

PDJ 2026-9023

**FINAL JUDGMENT AND
ORDER**

State Bar No. 25-2766

The Presiding Disciplinary Judge of the Supreme Court of Arizona, having reviewed the Agreement for Discipline by Consent pursuant to Rule 57(a), Ariz. R. Sup. Ct., accepts the parties' proposed agreement.

Accordingly:

IT IS ORDERED that Respondent, Michael S. Reeves, is reprimanded for his conduct in violation of the Arizona Rules of Professional Conduct, as outlined in the consent documents.

IT IS FURTHER ORDERED that Respondent is also placed on probation for a period of one (1) year, subject to early termination upon completion of the following terms of probation:

1. Continuing Legal Education (“CLE”): In addition to annual MCLE requirements, Respondent shall complete no less than six (6) hours of CLE program(s) regarding the ethical use of Artificial Intelligence, *e.g.*:

- Ghost in the Brief: Ethical Pitfalls of AI Generated Work Product (2 hours)
- Competency, Confidentiality, and Candor for Your AI-Powered Practice (1 hour)
- Artificial Intelligence for Lawyers (3 hours)
- A Journey Through the Labyrinth of AI: Understanding, Utilizing and Safeguarding Artificial Intelligence in Law (3 hours)

within the term of probation. Respondent shall provide the State Bar Compliance Monitor with evidence of completion of the program by providing the certificate of completion in addition to a copy of (a) his/her handwritten notes; or (b) typed or electronic notes, accompanied by a declaration, statement or affidavit that complies with Civil Rule 80(c), and which states he/she personally typed the notes while viewing the CLE program. Respondent should contact the Compliance Monitor at 602-340-7258 to make arrangements to submit this evidence. Respondent will be responsible for the cost of the CLE.

2. LOMAP (one-time consultation): Respondent shall contact the State Bar Compliance Monitor at (602) 340-7258, within 10 days from the date of service of this Order. Respondent shall submit to a one-time LOMAP consultation regarding the use of Artificial Intelligence in the practice of law. Respondent shall complete any follow up deemed necessary by LOMAP. Respondent will be responsible for any costs associated with LOMAP.

Respondent shall commit no further violations of the Rules of Professional Conduct.

IT IS FURTHER ORDERED that Respondent pay the costs and expenses of the State Bar of Arizona in the amount of \$ _____, within 30 days from the date of service of this Order. If not paid within the 30 days interest will begin to accrue at the legal rate.

IT IS FURTHER ORDERED that Respondent shall pay the costs and expenses incurred by the disciplinary clerk and/or Presiding Disciplinary Judge's Office in connection with these disciplinary proceedings in the amount of _____, within 30 days from the date of service of this Order. If not paid within the 30 days interest will begin to accrue at the legal rate.

DATED this _____ day of May, 2026.

**Honorable Lisa A. VandenBerg,
Presiding Disciplinary Judge**

Original filed with the Disciplinary Clerk of
the Office of the Presiding Disciplinary Judge
of the Supreme Court of Arizona
this _____ day of May 2026.

Copies of the foregoing e-mailed
this _____ day of May 2026, to:

Michael S. Reeves
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Respondent

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by: _____