

INVESTIGATIVE REFERRAL BRIEF

Submitted to the Office of Brad Miller, Pinal County Attorney

Public Probable Cause

This referral is submitted in the spirit of equal justice under law and accountability to the people of Arizona. It is not a political submission. It is a venue-for-justice referral grounded in publicly available records, timelines, and observable conduct establishing prima facie cause for lawful intake and investigation within Pinal County. Public confidence in government is strengthened when allegations are examined independently, regardless of political affiliation or policy disagreement. The facts summarized herein warrant review not because of who may be implicated, but because the conduct described implicates vulnerable children, taxpayer funds, and the integrity of Arizona's licensing and procurement systems.

Public records demonstrate that only after statewide media reporting exposed an _____ pay-to-play scandal involving Sunshine Residential Homes and the Governor's Office did a series of unprecedented actions occur: the creation of multiple layered shell entities, the removal of long-standing principals from ownership filings, establishment of a straw entity with Dev Balan, a real-estate transaction in Pinal County, publishing of sunlightresidentialhomes.com, and the issuance of a federal National Provider Identifier 1538054051.

Sunlight Forever Family, LLC established 11/1/2024. Member and agent Dev Balan a Correctional Officer 2 making \$27,488 annual income, would eventually disappear from stakeholders in purchase of 9780 W Vista Bonito Drive, Casa Grande 85194. At no time was DCS notified state contracts procured to Sunshine Residential Homes were advertised with a change in trade name, nor filings to add the DBA. It appears the Kottoor's were left off the six new real estate entities and Sunlight Forever Family, LLC as an illegal scheme possessing evil mens rea, and reaction to bribes scandal.

These actions represent a clear departure from decades of historical practice in which Sunshine-operated homes were openly owned and directly associated with the same principals while funded by public dollars. This brief respectfully requests that the Office independently examine these matters using its subpoena authority, preserve relevant records, and determine whether criminal or civil enforcement is warranted. The request is made solely in furtherance of equal justice and the protection of Arizona's most vulnerable populations.

EXECUTIVE SUMMARY

This submission compiles public records and timelines indicating potential violations related to the operation, branding, licensing, political contributions, and post-exposure restructuring of Sunshine Residential Homes and affiliated entities. Of particular note is the formation of a six-entity layered structure immediately following public exposure of _____ pay-to-play activity, coupled with contemporaneous real-estate acquisition in Pinal County and expansion into federal provider registration. These actions had not occurred at any time since at least 1996, despite decades of taxpayer-funded operations. This brief asserts no conclusions. It identifies investigatory issues for review and provides a structured roadmap for lawful intake, evidence preservation, and subpoena-backed inquiry.

PINAL COUNTY JURISDICTION

Pinal County jurisdiction is implicated through recorded real property transactions within the county, the formation and operation of entities conducting business affecting county residents, and potential misuse of public funds connected to county-based assets. These facts provide an independent and lawful basis for review by the Pinal County Attorney's Office.

CHRONOLOGY OF RELEVANT EVENTS

- 1996–2021: Sunshine Residential Homes operates using consistent ownership and trade-name practices while receiving taxpayer-funded
- 2019: Clip Artist Films initially reports procurement fraud uncovered with fake reviews on google.
- 2022–2023: Sunshine-associated individuals and entities make substantial political contributions to campaign committees, party committees, and a gubernatorial inaugural fund (public filings).
- Late 2023: Arizona Department of Child Safety authorizes a substantial reimbursement rate increase for Sunshine relative to peer providers (public reporting).
- June 2024: Media reporting publicly raises concerns regarding pay-to-play arrangements.
- Post–June 2024: For the first time in Sunshine’s documented history, long-standing principals do not appear on newly formed entities associated with Sunshine-branded operations.
- November 25, 2024: Real property transaction recorded in Pinal County.
- November 27, 2024: Formation of Maha Ganapathi Ventures, LLC, with five member LLCs, creating a six-entity layered ownership structure.
- August 2024 - current 2025: Clip Artist Films publishes investigative dossier “Sunshine Residential Homes - Review Manipulation Factors”, proving bribes were originally funded by procurement fraud and fraudulent schemes. AG Mayes refuses to prosecute.
- 2024–2025: Continued use of the Sunshine trade name across multiple entities and issuance of a federal National Provider Identifier.

ENTITIES OF INTEREST

- Public filings indicate that individuals historically associated with Sunshine operations do not appear on ownership or management documents for these newly formed entities.
- Sunshine Residential Homes (trade name usage under review)
- Maha Ganapathi Ventures, LLC
- Bala Ganapathi LLC
- MG Casa Grande Investments LLC
- Raja Rajeswari LLC
- Rasada Group LLC
- Shri Sai Chenna Venkata Investors LLC

POLITICAL CONTRIBUTIONS

Public campaign finance records reflect aggregate political contributions associated with Sunshine principals and affiliates exceeding \$400,000, including contributions to the Arizona Democratic Party and Katie Hobbs’s gubernatorial inaugural fund. These facts are included relevant to note AG Mayes and Maricopa County Attorney Rachel Mitchell are both slow walking the investigation. Recently another child had died by willful neglect Due to political pressure not charging the citizen called, Katie Hobbs with crimes.

Because party committees were beneficiaries of the contributions, independent review by a Pinal county prosecutor enhances public confidence and mitigates appearance concerns.

ISSUES FOR INVESTIGATION

- Whether political contributions constituted illegal gratuities or influenced official action.
- Whether Sunshine trade-name usage violated consumer fraud statutes or agency directives.
- Whether facilities were marketed or operated without proper licensure.
- Whether false statements or material omissions occurred in licensing, contracting, or NPI registration.
- Whether public funds were misused, laundered, or improperly retained.
- Whether Katie Hobbs may be charged with felonies in Pinal county
- Whether entity layering and real-estate transactions were undertaken to conceal beneficial ownership or shield assets.

EXHIBIT LIST (FOR PINAL INVESTIGATOR RETRIEVAL)

- Exhibit A: Arizona Corporation Commission filings for all entities listed herein.
- Exhibit B: Pinal County Recorder documents for real property transactions.
- Exhibit C: DCS and ADHS licensure records, notices, and directives.
- Exhibit D: Campaign finance disclosures (Arizona Secretary of State).
- Exhibit E: Archived website pages and domain registration records.
- Exhibit F: NPI registration records and related submissions.
- Exhibit G: Public reporting and media timelines.

REQUEST FOR ACTION

Respectfully, the undersigned requests that the Office of the Pinal County Attorney accept this brief for intake, preserve relevant records, and determine whether to open a formal investigation using lawful subpoena authority. Any determinations should be made independently by the Office following review of the evidence.

Submitted respectfully,

Gordon Rose
Editor In Chief
Clip Artist Films

INVESTIGATIVE REFERRAL BRIEF

Supplemental update through September 21, 2026 - public record, CAF evidence, subpoena analysis, and ethics issues

NEW SINCE JANUARY 2, 2026

The January referral remains the baseline. This supplement adds public developments, identifies the evidence that should have been preserved in Pinal County, separates documented facts from CAF source material and editorial conclusions, and states the exact statutory and ethics provisions supporting a potential State Bar charge.

DOCUMENTED PUBLIC DEVELOPMENTS

- August 21 - AG disposition. The Arizona Attorney General's Office said its two-year investigation reviewed more than one terabyte of data and over 100,000 documents but did not find the quid pro quo needed to support a bribery charge. The office declined prosecution and called for legislative reform.
- Financial disclosure expansion. Reporting on the released material states that Sunshine, Simon Kottoor, and connected persons or entities provided a reported \$580,840 to Democratic organizations, Hobbs-related committees, the inaugural fund, and a legal-defense fund. The total included \$150,000 to the legal-defense fund between November 2023 and May 2024.
- Michael Faust account. Former DCS Director Michael Faust told investigators that Simon Kottoor offered to recommend Faust's retention by Gov.-elect Hobbs if Faust approved a Sunshine rate increase. Kottoor denied making the offer. Mayes treated the conflicting accounts as insufficiently corroborated for prosecution.
- September 16 - legislative subpoenas. Senate Government Committee Chair Jake Hoffman announced subpoenas for a September 29 hearing, eight days before early voting. Public reporting identifies state officials, campaign personnel, Sunshine leadership, former DCS officials, records custodians, and the AG investigative file.
- Jakob Blodgett record. Associated Press reporting described two missed long-acting insulin doses, testimony that direct-care staff lacked necessary training, a DCS licensing violation with no fine or suspension, and a continuing criminal investigation. Sunshine said it followed required policies and procedures.

PINAL EVIDENCE THAT REQUIRED EARLY PRESERVATION

The following points come from CAF records and source material. The supporting exhibits should be attached to the next filing:

- Sunshine-branded marketing represented that a facility for adults with disabilities would open in Pinal County while the underlying ownership, trade-name, licensing, contract-notification, and provider-identity record required verification.
- After CAF published the Pinal findings and contacted organizations displayed on Sunshine-related pages, public-facing website material was removed or changed. The necessary evidence includes historical captures, content-management logs, domain records, access logs, and communications directing the changes.
- The January referral identified real-property, entity-formation, federal identifier, licensing, branding, and public-funds questions capable of independent investigation separate from the statewide political-contribution case.

THE MILLER ETHICS ISSUE

The issue is whether PCAO's solicited investigative handoff was genuine and competently handled, whether a disposition record exists, and whether officials were candid about the referral - not a demand that any particular charge be filed.

PRIMARY BAR RULE: ER 8.4(d)

Arizona Supreme Court Rule 42, ER 8.4(d), defines professional misconduct to include conduct prejudicial to the administration of justice. CAF's complaint theory is that initiating an investigative handoff, assigning or identifying an investigator, accepting a documented referral, failing to preserve time-sensitive evidence, producing no traceable disposition, and routing the matter for partisan timing - if proved by records and the Jeremiah Brosowske call - can constitute prejudice to justice rather than ordinary prosecutorial discretion.

COMPANION RULE: ER 8.4(c)

ER 8.4(c) reaches dishonesty, fraud, deceit, or misrepresentation. This rule becomes relevant only if communications, intake records, transfer records, or sworn testimony prove that Miller or his office misrepresented the referral's status, concealed what was done with it, or gave a knowingly false explanation.

STATUTORY DUTY AND PROSECUTOR-SPECIFIC RULE

- A.R.S. § 11-532(A)(2). Arizona law states that a county attorney shall institute proceedings before magistrates for persons charged with or reasonably suspected of public offenses when the county attorney has information that offenses were committed. This is the strongest affirmative duty language for the complaint record.
- Charging discretion remains legally significant only if an actual review or decision occurred. Arizona decisions place prosecution decisions with the county attorney. The complaint therefore demands the intake, assignment, investigative, preservation, and disposition record needed to determine whether discretion was exercised or merely invoked after the fact. Non-prosecution alone is not the misconduct theory.
- ER 3.8(a) is not the rule that compels an indictment. It requires a prosecutor to refrain from prosecuting a charge the prosecutor knows is unsupported by probable cause. It protects against unsupported prosecution; it does not require a prosecutor to file every requested charge.
- No located rule guarantees a written response to every citizen referral. The stronger demand for a written disposition arises from accountability, evidence preservation, the office's handling of this specific solicited referral, and proof of what officials represented - not from inventing a rule that does not exist.

FACTS THE BAR CHARGE SHOULD PROVE

- Who solicited and accepted the January 2 referral; the intake number; the assigned attorney or investigator; and every recorded disposition.
- Whether preservation requests or subpoenas were issued before Sunshine-related websites and public-facing material changed.
- Whether the referral or its nonpublic contents were sent to Hoffman, Republican Party actors, campaign actors, or legislative staff; who authorized that transfer; and for what lawful purpose.
- Whether the Jeremiah Brosowske recording shows the office understood that the requested objective was immediate child protection and contract cancellation rather than election strategy.
- Whether Miller, Brosowske, Hank Mueller, or another official made a false or incomplete statement about the referral's status, review, transfer, or evidentiary value.
- Attach: January 2 referral and delivery proof; Jeremiah Brosowske audio and certified transcript; emails, calls, voicemails, intake logs, and transfer records.
- Attach: Before-and-after website captures, partner-page evidence, and the corporate, property, licensing, contract, NPI, and trade-name exhibits.

RECORDED INTAKE AND INVESTIGATIVE HANDOFF

Jeremiah Brosowske call - 7 minutes, 18 seconds - working transcript and evidentiary assessment

WHAT THE RECORDING DIRECTLY ESTABLISHES

The call documents an affirmative PCAO pathway for the January 2 referral. Brosowske accepted and facilitated a written handoff, connected the submission to PCAO's chief investigator Hank Mueller, said Mueller was the person looking into it, stated that the investigation team would review solid facts, and agreed the office should take a hard look. Rose repeatedly said the purpose was protecting children rather than obtaining a political result. This is materially stronger than an unsolicited tip sent into a generic mailbox.

KEY ADMISSIONS AND REPRESENTATIONS

- 04:18-05:39 - Intake and assignment. Brosowske offered to connect the written submission to the office's investigator, said he was sending an investigation-request follow-up, identified former law-enforcement officer Hank Mueller as chief investigator, and said, "he's the one looking into it."
- 06:06-06:12 - Commitment to review. Brosowske said, "As long as you can get us some pretty solid facts ... our investigation team will look at it, and I think we should definitely take a hard look at it."
- 06:35-06:44 - Fact-based process. Brosowske described the investigators' job as going through and looking at the facts. Rose answered that he would deliver the written brief before close of business the following day.
- 02:20-02:25 and 06:23-07:09 - Express purpose. Rose said the children needed protection, politics should be set aside, and political outcomes were secondary. The closing exchange again framed the objective as protecting children across political disagreement.

WHY THIS SHARPENS THE MILLER COMPLAINT

NO COMMUNICATED DISPOSITION AFTER AN AFFIRMATIVE HANDOFF

The record supports a complaint centered on intake, assignment, reliance, preservation, follow-through, and candor. It does not by itself prove that no internal charging decision ever occurred. The acute question is whether PCAO created a real investigative file and disposition consistent with Brosowske's representations. If no such record exists, the office must explain why its chief of staff initiated an investigative handoff, identified the assigned investigator, accepted the promised brief, and then provided no documented outcome while time-sensitive evidence changed. If a record does exist, its dates, scope, contacts, preservation steps, legal analysis, transfers, and closure basis should be produced or identified to the extent permitted by law.

COMPLAINT THEORY AFTER THE AUDIO

- ER 8.4(c): applies if records show a knowingly false representation about assignment, review, status, transfer, or disposition.
- ER 8.4(d): applies if political routing, concealment, evidence loss, or sham intake prejudiced the administration of justice.
- A.R.S. § 11-532(A)(2): supplies the affirmative statutory-duty language when the county attorney has information that public offenses were committed and persons are charged with or reasonably suspected of them.
- ER 3.8(a): remains a probable-cause restraint on unsupported prosecution; it is not the source of a public-response requirement.
- Necessary proof: the Brosowske email, Mueller copy or introduction, intake metadata, assignment log, investigative notes, preservation activity, conflict review, communications with outside political actors, and any closure or declination record.

THE CALLBACK CHAIN: WHO AUTHORIZED WHAT?

The office initiated contact after Rose left a voicemail; the authorization trail determines Miller's personal responsibility

THE CALLBACK WAS NOT A COLD SUBMISSION

Rose states that he first left a voicemail with PCAO's front office and that Brosowske returned the call as chief of staff. PCAO's official organization chart confirms that title. The callback, investigation-request discussion, Mueller connection, and acceptance of the next-day brief establish an office-initiated intake sequence. They do not alone prove Miller authorized the callback or knew its contents beforehand.

THE TWO AUTHORIZATION PATHWAYS

Path	What it would establish	Records or testimony required
A - Miller consulted before callback	Direct advance knowledge or authorization; ties solicitation and handoff directly to Miller.	Testimony; voicemail-routing log; emails, texts, Signal messages, call records, calendars, notes, and pre-call instructions.
B - Brosowske acted first	Official intake without prior Miller direction; requires proof of later knowledge, approval, ratification, redirection, or termination.	Post-call communications; forwarding email; Mueller assignment; case entries; supervisory meetings; instructions; closure record.

SUPERVISORY BAR RULE: ER 5.3

MILLER'S LICENSE REQUIRES HIS OWN LINK TO THE CONDUCT

A chief of staff's title does not automatically make every act Miller's personal bar violation. ER 5.3 supplies the proper bridge for nonlawyer staff: a supervising lawyer can be responsible when the lawyer orders conduct, knowingly ratifies it, or learns of misconduct while consequences can still be avoided or mitigated and fails to take reasonable remedial action. The decisive issues are authorization, knowledge, ratification, supervision, and correction.

QUESTIONS FOR BROSOWSKE AND MILLER

- Who received Rose's voicemail, what was reported upward, and who decided Brosowske would return it?
- Did Brosowske speak with Miller before the callback? If not, when did he first brief Miller on the call, Mueller handoff, January 2 brief, and child-safety objective?
- Why did Brosowske ask, "How'd you get into this?" Was that genuine lack of background, rapport-building, or a question asked after an internal briefing?
- Who authorized Mueller, what file number was created, what work was performed, and what disposition was approved?
- Did Miller or Brosowske communicate with Hoffman, party personnel, the Biggs campaign, or legislative staff about the referral, its contents, or its timing?

TIME-TO-DISPOSITION BENCHMARK

No published PCAO source located in this review reports an average or median applicable to this citizen-originated referral. PCAO describes charge, decline, or further-investigation options but gives no decision deadline; county reports publish charge totals, not review latency. Request de-identified received, assigned, investigative-referral, closure, decline, and charge dates for comparable 2025-2026 matters, then calculate the median, range, and unresolved share.

RECORDS DEMAND

- Voicemail and telephone logs; Brosowske and Miller calendars; pre-callback communications; and the native investigation-request email with headers and forwarding history.
- Mueller assignment, intake number, notes, searches, subpoenas, witness contacts, preservation steps, findings, recommendations, closure coding, and approval.
- A de-identified comparator dataset sufficient to calculate typical review time. Arizona law requires records reasonably necessary to document official activities; privilege may justify targeted redaction, not invented statistics.

AUDIO EXHIBIT - WORKING TRANSCRIPT

Jeremiah Brosowske call | January 2026 | Part 1 of 2

Prepared from the supplied audio. Obvious name and entity spellings are normalized. Bracketed text marks an unclear passage. Verify all quotations against the original recording before filing or sworn use.

00:00 ROSE: Oh, okay, great. Yeah, so did you get a chance to go on the X account and check it out?

00:08 BROROWSKE: I did not. Is that where it's at?

00:10 ROSE: Yeah, so I've got a bunch of stuff. If you go to X and go to Governor Bribes, @GovernorBribes, the new stuff I just found in your county, it's all right there.

00:29 BROROWSKE: Governor Bribes.

00:34 BROROWSKE: Okay, my printer is not working with me today. Hang on one second.

00:39 ROSE: Yeah, no problem.

00:45 BROROWSKE: How'd you get into this?

00:47 ROSE: You know, man, I started journalism about eight, nine years ago. I had actually found a rapist who hadn't been caught yet doing legislation with Ducey. And then I exposed some corruption with some judge and a prosecutor and ended up getting framed, like real - like hardcore. So it took me five years to prove my innocence publicly and then got all my rights back, and that kind of spun me into a journalism career nationally. I was on the Kyle Rittenhouse defense team for about a year and stuff like that. But now I'm kind of in the center. I'm running for governor under the Green Party.

01:26 ROSE: This story, man, I'll tell you, I started on this in 2019. If you go to ClipArtistFilms.com, that's my main news site. The primary story is called Ain't No Sunshine. I discovered Sunshine Residential Homes and Simon Kottoor doing procurement fraud as far back as 2019. So I did a podcast on it. Years later, the Hobbs bribes thing bubbles up. I go, 'Oh, that's where I know where the money came from.' So I started reporting on that and picked up the story in August.

02:04 ROSE: Just to be candid with you, man, here's my part in it: three children have died, and nothing's happening. For whatever reason, Rachel Mitchell is not following through and all that. So here's my proposition: I think the kids need to be protected, and forget the politics.

02:25 ROSE: If you look at what I posted on that X account the last two, three days, basically to summarize it for you: if you look at SunshineResidentialHomes.com, six months after the pay-to-play scandal broke, the Kottoors used a guy named Dev Balan as a straw to pop an entity called Forever Family LLC.

02:53 ROSE: If you look at the website, Sunshine Residential Homes - Sunshine Forever Family. What they did was, for whatever reason after the scandal broke, they put a straw in, popped this entity in November 2024, buys the property like three weeks later. But the problem is, they're violating so many - I mean, it's felonies all over the place. If you look at the site, they're advertising that it's Sunshine Residential Homes, but there's no notice to DCS. It's real funky.

03:28 ROSE: My proposition is that if you guys can take a hard look at that, maybe that's a way to protect the kids where it's adjacent to the Hobbs thing. But the problem is Mayes isn't going to do anything, and for whatever reason Mitchell is just like - I don't know. So there you go, man.

03:49 BROROWSKE: Yeah, I hear you on that.

03:56 ROSE: If you can give me an email, I'll put a little brief together in the morning, a dossier with all my research and stuff. That's probably the cleanest way to give you guys a handoff, because the online stuff - some of it's getting-people's-attention stuff. I just want to get you the data.

04:18 BROROWSKE: [Partially unclear.] What would be a good email for you? I could give you my email, and then I could give you our main investigator. Actually, I'll give you my email and then maybe, if you want to, pipe in whoever's involved, and then I'll reply.

04:32 ROSE: It's tips, T-I-P-S, at ClipArtistFilms.com.

AUDIO EXHIBIT - WORKING TRANSCRIPT

Jeremiah Brosowske call | January 2026 | Part 2 of 2

04:55 ROSE: I would say you're a good investment of time, because I'm going to send over a lot of this broken down. The best thing for you to look at - in seven minutes you'll get a download. It's called E10, Ain't No Sunshine 2.0. I have it pinned. The first seven minutes is the breakdown of the crimes.

05:20 BROROWSKE: [Partially unclear.] Okay. I'm going to send you an investigation-request follow-up.

05:24 ROSE: Sounds good.

05:24 BROROWSKE: Right, and I copied our chief investigator. Obviously he's a former law-enforcement agent. His name is Hank Mueller, so he's the one looking into it. I just wanted to make the connection because, to me, I think it's a really good issue. I agree with - I mean, the Attorney General hasn't done anything on it.

05:45 ROSE: The problem is, just a few weeks ago that poor young lady died. It's because they're not having coverage. Besides the bribe issue, it's like the dude just - time and time again, we have a willful-neglect death every 90 days since summer. This is ridiculous.

06:06 BROROWSKE: As long as you can get us some pretty solid facts, I mean, our investigation team will look at it. And I think we should definitely take a hard look at it.

06:13 ROSE: Exactly. I look at it like there's a nexus now to Pinal County, so it's an opportunity for Mr. Miller to help the kids out. My piece in it, what's going to happen politically is going to happen politically. But I swear to God, bro, if another kid dies, I'm going to go nuts.

06:29 BROROWSKE: I don't blame you. As long as the facts are there - our investigators, the whole job they do is they just go through and look at the facts.

06:41 ROSE: Sure, sure. Absolutely. I'll put together a real nice brief for you guys and have it over to you before close of business tomorrow.

06:49 BROROWSKE: Okay. Thank you for your time. I really appreciate it. It's always nice to see people like you that truly care about the community.

06:57 ROSE: At the end of the day, if everybody just steps up and does the right thing - just because we don't agree politically doesn't mean we can't protect children, and not just lip service.

07:09 BROROWSKE: I appreciate that. For sure.

07:10 ROSE: All right, cool. Jeremiah, have a great night.

TRANSCRIPT STATUS

This is a working transcript created from the supplied recording. The original audio remains the controlling exhibit. SHA-256: 72da4c2029dce259ab4ab5490c7a2e6ecd0c2eebd5de31de37b255bc24abcfa7. Before a State Bar submission, prepare a final proofed transcript, retain the native audio and metadata, and attach the January 2 email and referral that completed the promised handoff.

THE MISSING PAIRED SUBPOENAS

Clip Artist Films and the Pinal County Attorney's Office hold different halves of the preservation record

A COMPLETE HEARING REQUIRES BOTH EVIDENCE CUSTODIANS

Clip Artist Films should be subpoenaed to authenticate the native website captures, source exhibits, publication chronology, and post-publication changes it preserved. Brad Miller, Jeremiah Brosowske, Hank Mueller, and the proper PCAO records custodian should be subpoenaed to establish what the office received, what Mueller captured, what preservation steps were taken, what investigation occurred, and whether any disposition or outside transfer exists. A side-by-side comparison is the direct way to determine whether PCAO preserved the same evidence, preserved less, or acted only after the public record changed.

LEGAL AUTHORITY - POWER, NOT AN AUTOMATIC DUTY

- A.R.S. § 41-1151. The presiding officer of either house or a committee chair may issue a legislative subpoena. The statute therefore gives Hoffman authority to subpoena Clip Artist Films, Miller, Brosowske, Mueller, and relevant records custodians.
- A.R.S. § 41-1154. Once a subpoena issues, knowing noncompliance without lawful excuse, refusal to answer a material and proper question, or refusal on reasonable notice to produce material and relevant records is a class 2 misdemeanor.
- A.R.S. § 41-1153. The Senate may, by a journal resolution, commit a noncompliant witness for legislative contempt and authorize the sergeant-at-arms to bring the witness before the Senate. A 2026 bill that would have expanded chair-level contempt authority was vetoed, so the enacted full-body process controls.
- No located statute or Senate rule requires this chair to subpoena a particular witness. The sound demand is therefore based on materiality, completeness, equal scrutiny, and Hoffman's public representation that the investigation will be impartial and will hear from everyone he believes has knowledge. Selective omission may undermine the hearing's credibility; it does not by itself create a private right to compel a subpoena.

NARROW RECORDS AND TESTIMONY REQUESTS

Target	Material evidence to request
Clip Artist Films / Gordon Rose / records custodian	Native captures and screen recordings; source URLs; capture dates and time zones; file metadata and hashes; before-and-after pages; content supplied by partners; court or public-record exhibits used for comparison; publication dates; contact logs; and testimony establishing collection method, custody, and authenticity.
PCAO / Brad Miller / records custodian	Referral intake and assignment; January 2 submission and attachments; preservation requests; case-management entries; disposition or declination; conflict review; disclosure or transfer outside PCAO; and communications with legislative, party, campaign, AG, DCS, or law-enforcement personnel.
Hank Mueller	Every website capture, download, search, preservation step, witness contact, lead, memorandum, exhibit, hash value, recommendation, and date of investigative activity; plus testimony identifying whether his collection matches the CAF archive.
Jeremiah Brosowske	Voicemail routing; callback authorization; investigation-request email with native headers; Mueller handoff; brief receipt; later status discussions; Miller communications; and any instruction to pause, close, reroute, or disclose the matter.

THE FOUNDATION QUESTION FOR THE HEARING

DID MUELLER CAPTURE WHAT CAF CAPTURED?

Require both custodians to produce native files and hash manifests before testimony. Compare URL, timestamp, page state, metadata, exhibit source, and scope. Then ask Miller and Mueller: what did PCAO possess before the pages changed; when was each item acquired; what investigative step followed; and what evidence now exists only because CAF preserved it? This makes the hearing testable and avoids substituting political narrative for an evidentiary record.

Proposed written request: Issue preservation letters immediately, followed by subpoenas under A.R.S. § 41-1151 for the testimony and records listed above. If the chair declines, identify on the committee record why these directly relevant custodians were omitted while the hearing seeks the Attorney General's full investigative file and claims impartial review of persons with direct knowledge.

KEY SUBPOENA WITNESS

The witness missing from the publicly reported Senate list

TESS WAGNER - SUBPOENA FOR TESTIMONY AND RECORDS

Arizona Sunshine Angels' official contact page identifies Tess Wagner as Executive Director and media contact. That page lists 17201 N. 63rd Avenue, Glendale - the same street address published by Sunshine Residential Homes. Shared location and the organizations' public relationship do not establish wrongdoing, but they make Wagner a high-value records and relationship witness. The subpoena should seek testimony, communications, board and partner records, donor and event records, website-change instructions, shared-address arrangements, and communications with Sunshine Residential, Simon or Elizabeth Kottoor, DCS, state officials, and nonprofit partners.

WHY WAGNER IS MATERIAL

- Identity and governance: her position, authority, reporting relationships, board communications, and record custody.
- Shared location and operations: use of the 17201 N. 63rd Avenue address, facilities, staff, systems, branding, and administrative services.
- Partner-page changes: who approved removals or revisions, when they occurred, why they occurred, and whether CAF's calls or publications triggered them.
- Sunshine relationships: communications and transactions involving Sunshine Residential, the Kottoors, DCS, political committees, contractors, participating nonprofits, and Pinal-connected entities.
- Preservation: emails, texts, cloud files, donor-management records, website logs, meeting minutes, calendars, and phone records from 2022 through the present.

PUBLICLY REPORTED SEPTEMBER 29 SUBPOENA TARGETS

The table lists individuals named in public reporting. Exact subpoena copies should control over news summaries.

Individual	Role	Reported purpose / evidence area
Katie Hobbs	Governor	Rate-increase knowledge; contacts; inaugural and legal-defense funds; executive-office communications.
Kris Mayes	Attorney General	Investigation scope, decisions, witness treatment, omitted material, and production of the investigative file.
Christian Slater	Hobbs spokesperson	Public statements, executive-office communications, and responses concerning Sunshine and the rate increases.
Nicole DeMont	Hobbs campaign manager	Campaign, donor, fund, event, and Kottoor-related communications and records.
Simon Kottoor	Sunshine founder / owner	Contributions, rate requests, Faust conversation, state contacts, contracts, and organizational relationships.
Elizabeth Kottoor	Sunshine-connected donor	Contributions, fund contacts, Sunshine relationships, and related financial or communication records.
Michael Faust	Former DCS director	Rate-request denials, Kottoor conversation, contemporaneous reports, and retention discussion.
Shalom Jacobs	Former DCS deputy director	DCS knowledge, contemporaneous reporting, rate-review history, and internal communications.

SUBPOENA GAPS AND POLITICAL TIMING

What the hearing should add - and what cannot wait for the hearing

UNNAMED CATEGORIES ALREADY REPORTED

- Members of the Governor's Office and Attorney General's Office, including investigators with direct knowledge of the investigation.
- Current and former DCS employees with knowledge of Sunshine rate requests, capacity claims, procurement, licensing, and internal pressure discussions.
- Custodians for the Hobbs inaugural fund, the governor's legal-defense fund, and the Attorney General's investigative records.

REQUESTED ADDITIONS TO THE SUBPOENA LIST

- Tess Wagner - Arizona Sunshine Angels executive director and records custodian; shared-address, partnership, website, donor, and Sunshine-relationship evidence.
- Brad Miller - receipt, intake, preservation, disposition, transfer, conflict review, and timing of the January 2 Pinal referral.
- Jeremiah Brosowske - callback authorization, solicitation and receipt of the referral, statements captured in the audio transcript, Miller communications, and any transmission to legislative or party actors.
- Hank Mueller - investigative assignment, work performed, witnesses contacted, records preserved, and disposition recommendations.
- Dev Balan - Sunlight Forever Family, property transaction, entity filings, Sunshine branding, and operational or financial relationships.
- Relevant website administrators and nonprofit partners - content removals, instructions, calls received, and preservation of historical records.

CHILD-PROTECTION ACCOUNTABILITY POSITION

THE COST OF DELAY IS NOT ABSTRACT

CAF's position is that the January 2 referral presented a child-protection and public-contract emergency, not an election-calendar opportunity. The submitter told Brosowske that the objective was to cancel unsafe contracts and protect children. If another child had suffered preventable harm while officials delayed preservation, investigation, or contract review, CAF would treat that harm as a foreseeable institutional failure. Legal causation and individual liability would still require case-specific proof.

CAF's evidence record attributes systemic responsibility for the deaths of Jakob Blodgett, Zariah, and Sarabeth Sokolsky to failures in Arizona's child-welfare and provider-oversight system. The Associated Press record independently supports the core care and enforcement failures in Jakob's case. The Zariah and Sarabeth files should be attached as CAF-sourced exhibits before this section is used as an evidentiary assertion outside the referral.

POLITICAL TIMING QUESTION

The September 29 hearing is scheduled eight days before early voting, and public reporting notes Hoffman's political consulting firm's work supporting Andy Biggs. Hobbs' representatives call the hearing political; Hoffman says he can separate the roles. Those competing facts do not resolve motive. They do justify asking whether the Pinal referral was independently handled when received or preserved for maximum election impact. Legislative oversight may expose evidence, but it cannot replace an independent criminal investigation or a documented prosecutorial disposition.

REQUESTED IMMEDIATE ACTION

- Issue a written status and disposition for the January 2 referral, including every transfer or disclosure outside PCAO.
- Preserve and produce intake records, assignment records, conflict reviews, communications, website-preservation efforts, and contacts with legislative, party, or campaign actors.
- Evaluate the Pinal consumer-representation, licensing, property, entity, and public-funds evidence separately from the AG bribery analysis.
- Add Tess Wagner and the requested Pinal witnesses to the subpoena plan; obtain records before testimony so questioning can be document-driven.
- Preserve the Jeremiah Brosowske recording as the controlling exhibit and attach a final proofed transcript with the January 2 email and referral.

PUBLIC SOURCES

Authorities and reporting cited in this supplemental update

- [A.R.S. § 11-532 - County attorney powers and duties](#)
- [Arizona Supreme Court rules materials - Rule 42 / ER 3.8](#)
- [Arizona Attorney General findings - August 21, 2026](#)
- [ABC15 - publicly reported subpoena recipients](#)
- [KJZZ - hearing, subpoenas, and political-timing responses](#)
- [Arizona Sunshine Angels - Tess Wagner contact and address](#)
- [Associated Press - Jakob Blodgett care and enforcement record](#)
- [State Bar of Arizona - submitting a charge](#)
- [PCAO official organization chart - Jeremiah Brosowske, Chief of Staff](#)
- [PCAO Victim Services - charging-review workflow](#)
- [Arizona State Bar - ER 5.1 through ER 5.3 supervisory duties](#)
- [A.R.S. § 39-121.01 - maintenance and production of public records](#)
- [A.R.S. § 41-1151 - issuance and service of legislative subpoena](#)
- [A.R.S. § 41-1153 - legislative contempt for subpoena disobedience](#)
- [A.R.S. § 41-1154 - refusal to attend, answer, or produce material records](#)
- [Governor's veto of HB 2745 - chair-level contempt expansion](#)