

BEFORE THE ALABAMA COURT OF THE JUDICIARY

IN THE MATTER OF:

STATE OF ALABAMA JUDICIAL INQUIRY
COMMISSION

V.

THE HONORABLE TRACIE A. TODD
CIRCUIT JUDGE, BIRMINGHAM DIVISION,
CRIMINAL DIVISION, JEFFERSON COUNTY, ALABAMA

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FILED

JUL -2 2021

COURT OF THE JUDICIARY
Rebecca C. Oates
Secretary

Case # 58

AMENDED ANSWER

Judge Todd denies each allegation of the complaint alleging violations of the Canons of Judicial Ethics and demands strict proof thereof. Additionally, Judge Todd avers the following affirmative defenses:

AFFIRMATIVE DEFENSES

1. Statute of limitations;
2. Theory of Condonation;
3. Doctrine of Laches and Equity;
4. Doctrine of Unclean Hands;
5. Commission proceedings commenced on unverified complaint in violation of RPJC Rule 6; and
6. Michael Anderton, the undersigned affiant, was not the proper party to initiate Commission proceedings.

Respectfully submitted by Counsel for Judge Todd,

/s/ Emory Anthony, Jr.
1117 Twenty Second Street South
Birmingham, Alabama 35205
(205) 776-2064

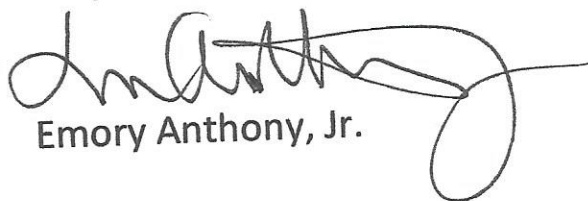
/s/ William Pompey
Pompey & Pompey, P.C.
117 Broad Street
Camden, Alabama 36726
(334) 682-9032

CERTIFICATE OF SERVICE

I hereby certify that I have on this 2nd day of July 2021, electronically filed the foregoing with the court of the Judiciary, and that I have further served a copy upon the following by placing same in the United States Mail, postage prepaid and properly addressed as follows:

Rosa H. Davis
Attorney for the Commission
Alabama Judicial Inquiry Commission
P.O. Box 303400
Montgomery, Alabama 36130-3400

Respectfully Submitted,



Emory Anthony, Jr.